



**REPORT ON RISK AND CAPITAL MANAGEMENT
PILLAR3 OF THE BASEL
FOR THE YEAR ENDED 31 DECEMBER 2024**

DISCLOSURE OF INFORMATION UNDER PART EIGHT OF REGULATION (EU) No 575/2013

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(All amounts are in EUR thousand, unless otherwise stated)

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This report was approved by the Management Board of the Bank on 26 March 2025.

INTRODUCTION

This document provides additional unaudited information in accordance with Commission Implementing Regulation (EU) 2021/637; Guideline EBA / GL / 2020/12 of the European Banking Authority (EBA) amending Guideline EBA / GL / 2018/01 on uniform disclosure in accordance with Regulation (EU) No 1095/2010 Article 473a of Regulation (EU) No 575/2013, taking into account the transitional provisions aimed at mitigating the impact of the adoption of IFRS 9 on own funds; Commission Implementing Regulation (EU) 2022/2453 amending the technical implementation standards set out in Implementing Regulation (EU) 2021/637 regarding the disclosure of information on environmental, social and governance risks.

The annual report of Šiaulių Bankas AB discloses information related to risk, its management and capital. This document provides additional information, which is published together with the Independent Auditor's Report, Financial Statements and Annual Report. This document discloses only such information that is relevant, non-confidential and not considered as commercial secret.

This document presents the own funds of Šiaulių Bankas Financial Group, its internal capital indicators, the main features of capital instruments, justifies the appropriateness of risk management and describes the overall risk profile of an organization, taking into account the business strategy.

The document discloses consolidated information as of 31 December 2024.

REPRESENTATION REGARDING SUITABILITY OF RISK MANAGEMENT MEASURES

The risk management systems applicable by Šiaulių Bankas AB are appropriate taking into account the size, nature of activities and strategy of the Bank and its subsidiaries (the Group - together with the Bank).

DISCLOSURE OF KEY PARAMETERS

Template EU OV1 - Overview of total risk exposure amounts

		Total risk exposure amounts (TREA)		Total own funds requirements
		31-12-2024	30-09-2024	31-12-2024
1	Credit risk (excluding CCR)	2,228,830	2,267,388	178,306
2	Of which the standardised approach	2,228,830	2,267,388	178,306
3	Of which the Foundation IRB (F-IRB) approach			
4	Of which slotting approach			
EU 4a	Of which equities under the simple risk weighted approach			
5	Of which the Advanced IRB (A-IRB) approach			
6	Counterparty credit risk - CCR	25,281	24,434	2,022
7	Of which the standardised approach	4,862	3,642	389
8	Of which internal model method (IMM)			
EU 8a	Of which exposures to a CCP			
EU 8b	Of which credit valuation adjustment - CVA	75	131	6

(All amounts are in EUR thousand, unless otherwise stated)

9	Of which other CCR	20,344	20,661	1,628
10	Not applicable			
11	Not applicable			
12	Not applicable			
13	Not applicable			
14	Not applicable			
15	Settlement risk			
16	Securitisation exposures in the non-trading book (after the cap)	105,950	110,960	8,476
17	Of which SEC-IRBA approach			
18	Of which SEC-ERBA (including IAA)			
19	Of which SEC-SA approach	105,950	110,960	8,476
EU 19a	Of which 1250% / deduction			
20	Position, foreign exchange and commodities risks (Market risk)	16,696	15,303	1,336
21	Of which the standardised approach	16,696	15,303	1,336
22	Of which IMA			
EU 22a	Large exposures			
23	Operational risk	329,853	273,992	26,388
EU 23a	Of which basic indicator approach	329,853	273,992	26,388
EU 23b	Of which standardised approach			
EU 23c	Of which advanced measurement approach			
24	Amounts below the thresholds for deduction (subject to 250% risk weight)			
25	Not applicable			
26	Not applicable			
27	Not applicable			
28	Not applicable			
29	Total	2,706,609	2,692,077	216,529

Template EU KM1 - Key metrics template

		a	b	c	d	e
		31-12-2024	30-09-2024	30-06-2024	31-03-2024	31-12-2023
Available own funds (amounts)						
1	Common Equity Tier 1 (CET1) capital	511,905	476,134	459,166	465,393	485,311
2	Tier 1 capital	562,050	476,134	459,166	465,393	485,311
3	Total capital	660,034	571,134	525,113	528,276	546,599
Risk-weighted exposure amounts						
4	Total risk exposure amount	2,706,609	2,692,077	2,624,728	2,502,823	2,439,333
Capital ratios (as a percentage of risk-weighted exposure amount)						
5	Common Equity Tier 1 ratio (%)	18.91%	17.69%	17.49%	18.59%	19.90%
6	Tier 1 ratio (%)	20.77%	17.69%	17.49%	18.59%	19.90%
7	Total capital ratio (%)	24.39%	21.22%	20.01%	21.11%	22.41%
Additional own funds requirements to address risks other than the risk of excessive leverage (as a percentage of risk-weighted exposure amount)						
EU 7a	Additional own funds requirements to address risks other than the risk of excessive leverage (%)	2.05%	2.05%	2.05%	2.05%	2.05%
EU 7b	of which: to be made up of CET1 capital (percentage points)	0.012	0.012	0.012	0.012	0.012
EU 7c	of which: to be made up of Tier 1 capital (percentage points)	0.015	0.015	0.015	0.015	0.015
EU 7d	Total SREP own funds requirements (%)	10.05%	10.05%	10.05%	10.05%	10.05%

(All amounts are in EUR thousand, unless otherwise stated)

Combined buffer and overall capital requirement (as a percentage of risk-weighted exposure amount)						
8	Capital conservation buffer (%)	2.50%	2.50%	2.50%	2.50%	2.50%
EU 8a	Conservation buffer due to macro-prudential or systemic risk identified at the level of a Member State (%)	0.00%	0.00%	0.00%	0.00%	0.00%
9	Institution specific countercyclical capital buffer (%)	1.00%	1.00%	1.00%	1.00%	0.99%
EU 9a	Systemic risk buffer (%)	0.22%	0.21%	0.20%	0.20%	0.20%
10	Global Systemically Important Institution buffer (%)	0.00%	0.00%	0.00%	0.00%	0.00%
EU 10a	Other Systemically Important Institution buffer (%)	1.00%	1.00%	1.00%	1.00%	1.00%
11	Combined buffer requirement (%)	4.71%	4.71%	4.70%	4.70%	4.69%
EU 11a	Overall capital requirements (%)	14.76%	14.76%	14.75%	14.75%	14.74%
12	CET1 available after meeting the total SREP own funds requirements (%)	13.23%	10.15%	9.96%	11.06%	12.36%
Leverage ratio						
13	Total exposure measure	5,008,786	5,235,475	5,264,328	5,069,058	5,081,739
14	Leverage ratio (%)	11.22% ¹	9.09%	8.72%	9.18%	9.55%
Additional own funds requirements to address the risk of excessive leverage (as a percentage of total exposure measure)						
EU 14a	Additional own funds requirements to address the risk of excessive leverage (%)	0.00%	0.00%	0.00%	0.00%	0.00%
EU 14b	of which: to be made up of CET1 capital (percentage points)	0.0000	0.0000	0.0000	0.0000	0.0000
EU 14c	Total SREP leverage ratio requirements (%)	3.00%	3.00%	3.00%	3.00%	3.00%
Leverage ratio buffer and overall leverage ratio requirement (as a percentage of total exposure measure)						
EU 14d	Leverage ratio buffer requirement (%)	0%	0%	0%	0%	0%
EU 14e	Overall leverage ratio requirement (%)	3%	3%	3%	3%	3%
Liquidity Coverage Ratio						
15	Total high-quality liquid assets (HQLA) (Weighted value -average)	964,617	929,794	833,436	707,818	570,809
EU 16a	Cash outflows - Total weighted value	554,112	548,570	514,026	494,885	486,284
EU 16b	Cash inflows - Total weighted value	71,577	73,735	115,991	171,247	228,271
16	Total net cash outflows (adjusted value)	482,535	474,835	398,035	323,638	258,013
17	Liquidity coverage ratio (%)	202.24%	198.25%	217.87%	228.81%	236.08%
Net Stable Funding Ratio						
18	Total available stable funding	4,144,310	3,909,179	3,506,663	3,478,108	3,730,319
19	Total required stable funding	2,783,559	2,768,577	2,599,378	2,503,222	2,608,889
20	NSFR ratio (%)	148.89%	141.20%	134.90%	138.95%	142.98%

Template TFAS 9-FL - Comparison of institutions' own funds and capital and leverage ratios with and without the application of transitional arrangements for IFRS 9 or analogous ECLs

		31-12-2024	30-09-2024	30-06-2024	31-03-2024	31-12-2023
Available capital (amounts)						
1	Common Equity Tier 1 (CET1) capital	511,905	476,134	459,166	465,393	485,311
2	Common Equity Tier 1 (CET1) capital as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	502,998	467,682	451,088	457,337	469,738
3	Tier 1 capital	562,050	476,134	459,166	465,393	485,311
4	Tier 1 capital as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	553,143	467,682	451,088	457,337	469,738
5	Total capital	660,034	571,134	525,113	528,276	546,599
6	Total capital as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	651,127	562,682	517,035	520,220	531,026
Risk-weighted assets (amounts)						

¹ Update date 28-10-2025.

(All amounts are in EUR thousand, unless otherwise stated)

7	Total risk-weighted assets	2,706,609	2,692,077	2,624,728	2,502,823	2,439,333
8	Total risk-weighted assets as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	2,697,703	2,683,625	2,616,650	2,494,767	2,423,760
Capital ratios						
9	Common Equity Tier 1 (as a percentage of risk exposure amount)	18.91%	17.69%	17.49%	18.59%	19.90%
10	Common Equity Tier 1 (as a percentage of risk exposure amount) as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	18.65%	17.43%	17.24%	18.33%	19.38%
11	Tier 1 (as a percentage of risk exposure amount)	20.77%	17.69%	17.49%	18.59%	19.90%
12	Tier 1 (as a percentage of risk exposure amount) as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	20.50%	17.43%	17.24%	18.33%	19.38%
13	Total capital (as a percentage of risk exposure amount)	24.39%	21.22%	20.01%	21.11%	22.41%
14	Total capital (as a percentage of risk exposure amount) as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	24.14%	20.97%	19.76%	20.85%	21.91%
Leverage ratio						
15	Leverage ratio total exposure measure	5,008,786	5,235,475	5,264,328	5,069,058	5,081,739
16	Leverage ratio	11.22%	9.09%	8.72%	9.18%	9.55%
17	Leverage ratio as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	10.19%	8.95%	8.58%	9.04%	9.27%

As of 1 January 2018, Šiaulių Bankas AB transitioned to the application of IFRS 9 and exercised the option provided for in Article 473a (1) of CRR to apply transitional measures to institutions to mitigate the impact of the introduction of IFRS 9 on own funds and chose to apply Article 473a (4) of CRR, it is a dynamic component. The bank did not change its initial decision made in 2018. The bank shall assign a 100% risk weight to the amount of ABSA referred to in point (a) of the second subparagraph of Article 473a (1) of Regulation 2020/873.

The transitional provisions of IFRS 9 shall no longer apply from 01.01.2025.

Template EU INS1 - Insurance participations

		a	b
		Exposure value	Risk exposure amount
1	Own fund instruments held in insurance or re-insurance undertakings or insurance holding company not deducted from own funds	37,910	94,775

Table EU OVC - ICAAP information

One of the main buffers against potential losses is a strong capital base, so the aim is to maintain a sufficient capital buffer to cover the increased level of risk. A sound, effective and comprehensive Internal Capital Adequacy Assessment Process (ICAAP) contributes to a clear assessment of the risk capital and goes hand in hand with risk management and management communication processes, based on a thorough risk strategy that produces an effective prudential framework.

The purpose of the Bank's ICAAP is to carry out processes to ensure that the Bank Group's capital requirements are sufficient to cover the risks of the appropriate nature and level arising or likely to arise from the banking activities and to ensure the continuity of the business, and that the Bank's capital base is adequately developed.

The Board of the Bank, based on the results of the ICAAP and all other relevant information, approves the Bank's capital adequacy assessment in the form of a Capital Adequacy Statement.

The ICAAP includes the Bank's self-assessment, testing and determination of internal capital requirements. The internal self-assessment identifies the risks inherent in the Group's activities and assesses them using selected assessment methods. The risk level is determined by assessing the impact of the risk on the Group's earnings and capital. Once the Bank's self-assessment has identified the risk structure and levels of individual risks, testing is performed to assess the potential impact on the Group's financial position, economic and regulatory capital and liquidity in the event of an adverse event and/or changes in the financial or economic environment. The main objective of the stress test is to determine whether the Group's capital is sufficient to cover potential losses arising from adverse macroeconomic and financial conditions.

For ICAAP purposes, the Group carries out stress tests to determine whether the level of capital is sufficient for this scenario. The scenarios for the stress testing of the Bank Group as at end-2024 have been selected taking into account external factors that may affect the Group's activities: macroeconomic factors such as negative macroeconomic indicators, geopolitical threats affecting the energy, transport and commodity markets, and the risks stemming from potential interest rate changes.

The internal capital requirement is defined as the results of the baseline scenario. The results are assessed from both a normative and an economic perspective. The internal capital requirement is calculated for those risks for which the normative and economic capital requirement calculated in the testing was higher than the regulatory requirement.

The results of the 2024 ICAAP show that the Bank Group has a capital buffer that ensures that the mandatory total capital requirement is met, both in a baseline and in an adverse scenario with severe economic stress.

DISCLOSURE OF RISK MANAGEMENT OBJECTIVES

Table EU OVA - Institution risk management approach

OPERATIONAL RISK MANAGEMENT

A full disclosure of all material risks faced by the Bank Group is provided in the Explanatory Notes to the 2024 Financial Statements under "Financial Risk Management" (page 23).

The Group analyses, assesses, assumes and manages the risks or groups of risks it faces in its operations. The purpose of risk management is to ensure a sufficient return on equity by managing risks conservatively. In implementing its risk management strategy, the Bank Group aims not only to minimise potential risks, but also to ensure an optimal risk-return ratio and efficient allocation of capital.

Risk assessment is a continuous, ongoing process, involving both the ongoing analysis of existing risks and the identification of new or emerging risks in the process of introducing new products and in the event of external or intra-group changes. The ICAAP includes, at least annually, an overall assessment of the risks specific to the Bank Group.

The main risks of the Bank Group are credit and liquidity risks. Other risks to which the Group is exposed include market, concentration, operational, IT, model, compliance, interest rates on the banking book and ESG (environmental, social and governance) risks. Market risk includes foreign exchange rate, interest rate and security price risks. The Bank Group improves a framework for qualitative assessment parameters for ESG risks (which include the risks of climate change), which is integrated into processes and the Group's governance system. Other risks are considered to be insignificant and are therefore not assessed.

Risk management is a structured, coordinated and continuous process at all levels of the Group, with the following objectives: to align business strategy and risk tolerance; to find solutions in response to risk; to reduce operating losses; to increase business opportunities and competitiveness; to identify multiple overlapping risks, either separately or in an integrated way; and to improve the capital allocation.

The Bank Group manages operational risk using a multi-tier management system that enables informed decision-making. Risk is assessed from the bottom up and from the top down throughout the management chain, as well as across all business lines, using consistent terminology and methodologies across the Group.

To avoid conflicts of interest, the units performing risk control functions are separated from the units whose direct activities are related to the exposure to the various risks of banking activities:

- the first line of defence, which includes the Group's business units directly serving customers or indirectly involved in the provision of services to the Group's customers, is responsible for the ongoing and active management of risk in its business unit through the establishment and monitoring of risk limits and compliance with these limits, and through the implementation of controls and processes to establish, monitor and report the established risk limits and/or thresholds;
- internal risk control functions are performed by the second line of defence units of the Risk Management Division and Compliance, which are responsible for controlling the Bank Group's operational risks;
- The third line of defence is the Internal Audit Division, which provides a comprehensive, independent and objective assessment of risk management and the effectiveness and adequacy of the Bank's internal control system.

GENERAL DESCRIPTION OF THE RISK MANAGEMENT SYSTEM

The Bank's Board has approved the Group's Risk Strategy, which covers the main principles of risk management and the allocation of roles and responsibilities in the risk management process. The risk management system includes processes to ensure that the Group identifies, assesses (and, where possible, measures), manages, monitors risks and reports on them. These processes cover all identified material risks. The Group's risk management system includes:

- risk appetite and risk management strategy;
- remuneration policy that is consistent with and encourages effective risk management;
- internal capital and liquidity adequacy assessment processes (ICAAP, ILAAP);
- identifying significant risks and developing measures to manage them;
- internal control over risk management, the main principles of which are set out in the Regulations for the Organisation of Internal Control;
- internal audit, which regularly assesses the effectiveness of risk management processes.

To ensure that the Bank Group operates in an acceptable risk environment in its current and future activities, the Board of the Bank has established an overall risk appetite. Risk appetite is defined as the nature and level of risk that the Group is willing to accept in the conduct of its business. Based on risk appetite, individual risk limits have been set for risks, which are a means of monitoring and controlling the magnitude and concentration of the risks assumed. Risk limits and indicators provide early warning of changes in risk and are closely monitored to ensure that risks are kept within the risk appetite.

DISCLOSURE OF A CONCISE RISK REPORT APPROVED BY THE MANAGEMENT BODY

The Group seeks to manage its business so as to avoid excessive losses and depletion of capital in the normal course of business and accepts risk in a conscious and controlled manner.

The Bank Group maintains a capital buffer in excess of the required minimum capital adequacy, ensuring the smooth operation of the Group and increasing the Group's ability to neutralise unfavourable business scenarios and shocks. The risk appetite for capital is determined taking into account the internal assessment of capital requirements and the Group's current and future capital requirements and regulatory capital buffers. At the end of 2024, the CET1 capital ratio was 18.91 %, TIER1 capital ratio was 20.77% and the total capital ratio – 24.39 %. Capital ratios are well above both regulatory requirements and target capital. A leverage ratio of 11.22 % indicates a healthy buffer up to the minimum leverage ratio requirement of 3 %.

To ensure sufficient level of protection for the Group's creditors, the Bank seeks to ensure compliance with the established intermediate levels of the minimum requirement for own funds and eligible liabilities (MREL).

The Group aims to have a high-quality credit portfolio by implementing a credit risk culture based on long-term customer relationships, focusing on knowing the customer, understanding the economic feasibility of the financing transaction and the customer's ability to meet its obligations.

Liquidity risk appetite of the Bank Group is formed in such a way that the Group is able to fulfil its obligations to customers and legal obligations to partners under both normal and disrupted financial market conditions during the given survival period. Risk appetite is constrained by regulatory Liquidity Coverage Ratio (LCR) and Net Stable Funding Ratio (NSFR).

The Bank Group maintains a high-quality liquidity buffer to ensure that the Group can operate and continue its core business in the face of unexpected shocks. Maintaining a liquidity buffer, together with funding planning and risk identification, are key tools to ensure that liquidity risk does not exceed appetite and supports the Group's strategic objectives. In 2023, the Bank Group's liquidity ratios exceed regulatory requirements.

Credit risk accounts for 87.2% of RWA, i.e., the most significant risk exposure. During 2024, the Group's gross loans to customers increased by 18% and the finance lease receivables portfolio increased by 11%. The customer base of the loan portfolio consists mainly of small and medium-sized enterprises and private individuals operating in Lithuania. The concentration of the loan portfolio in terms of borrowers is low and the number of customers in the portfolio is high.

Market risk represents 0.62% of the total risk exposure amount (RWA). The Bank works with relatively low trading volumes, i.e., is engaged in relatively small trading book business; therefore, it assumes limited market risk.

In the interest rate banking book, risk appetite is expressed as the negative impact on economic value and net interest income from adverse interest rate risk scenarios.

Operational risk losses in 2024 amounted to EUR 564 thousand. The Bank Group may be exposed to various operational risks inherent to its business: performance or process errors, internal and external fraud, loss of human resources, commercial disputes, non-compliance with the established processes and procedures. The Group seeks to ensure proper business continuity in crisis situations. The Group aims to ensure that continuity plans are up-to-date and identify potential material threats.

STATEMENT ON THE ADEQUACY OF RISK MANAGEMENT MEASURES APPROVED BY THE MANAGEMENT BODY

Risks arising from the Group's activities are managed through appropriate risk mitigation measures, taking into account the Group's business strategy and the complexity of its products. The improvement of risk management measures is an ongoing process performed in line with the requirements of the European Union and supervisory authorities and in accordance with the Bank's operational risk management strategy. Establishing an appropriate risk

management system, continuously improving it and applying its measures in day-to-day operations are some of the most important prerequisites for the Group's success in the long term.

The Group monitors the tense geopolitical situation in order to properly and timely assess and identify the potential impact of Russia's invasion of Ukraine on the Group's operations and the quality of its portfolio due to the risks it poses to clients.

Table EU OVB - Disclosure on governance arrangements

Organizational management structure, management bodies, structure and functions of the committees, etc. are disclosed in the Consolidated Management Report for 2024:

- The composition of the management bodies and the principles for the appointment of their members, as well as information on the competencies of each member of the management body and the positions of directors in charge, are disclosed in the chapter "Management of the Bank" of the Consolidated Management Report 2024 (page 141) and in the Governance information for 2024 (page 161);
- Information on the diversity policy applied in the selection of the members of the management body is disclosed in the section "Management of the Bank" of the Consolidated Management Report 2024 (page 141) and in the Governance information for 2024 (page 161);
- The structure, functions and composition of the committees are disclosed in the section "Committees formed in the Bank, their areas of activity" of the Consolidated Management Report 2024 (page 142) and in the Governance information for 2024 (page 161).

DISCLOSURE OF THE SCOPE OF APPLICATION

Template EU LI1 - Differences between the accounting scope and the scope of prudential consolidation and mapping of financial statement categories with regulatory risk categories

	a	b	c	d	e	f	g
	Carrying values as reported in published financial statements	Carrying values under scope of prudential consolidation	Carrying values of items				Not subject to own funds requirements or subject to deduction from own funds
			Subject to the credit risk framework	Subject to the CCR framework	Subject to the securitisation framework	Subject to the market risk framework	
Breakdown by asset classes according to the balance sheet in the published financial statements							
1	Cash and cash equivalents	395,136	387,680	387,680			
2	Securities in the trading book	235,110	18,020			18,020	
3	Due from other banks	3,121	3,121	3,121			
4	Derivative financial instruments	1,093	1,093	10	1,083		
5	Loans to customers	3,117,700	3,117,700	3,081,374	30,189	6,137	
6	Finance lease receivables	316,897	316,897	316,897			
7	Investment securities at fair value	43,868	43,868	43,868			
8	Investment securities held to collect cash flows	726,937	716,864	716,864			
9	Investments in subsidiaries and associates	270	38,180	38,180			
10	Intangible assets	43,617	40,569				40,569

(All amounts are in EUR thousand, unless otherwise stated)

11	Property, plant and equipment	15,261	15,070	15,070				
12	Investment property							
13	Current income tax prepayment	82	82	82				
14	Deferred income tax asset	6,076	6,074	6,074				
15	Other non-financial assets	17,301	17,193	17,193				
16	Assets classified as held for sale	150	150	150				
17	Total assets	4,922,619	4,722,561	4,626,563	31,272	6,137	18,020	40,569
Breakdown by liability classes according to the balance sheet in the published financial statements								
1	Due to other banks and financial institutions	65,860	67,926					67,926
2	Derivative financial instruments	123	123		123			
3	Due to customers	3,537,972	3,537,972	22,909				3,515,063
4	Debt securities in issue	448,159	448,159					448,159
5	Special and lending funds	23,037	23,037					23,037
6	Current income tax liabilities	303	206					206
7	Deferred income tax liabilities	6,141	6,141					6,141
8	Liabilities related to insurance activities	198,432						
9	Other non-financial liabilities	57,420	52,492					52,492
10	Total liabilities	4,337,447	4,136,056	22,909	123	-	-	4,113,024

Template EU LI2 - Main sources of differences between regulatory exposure amounts and carrying values in financial statements

		a	b	c	d	e
		Total	Items subject to			
			Credit risk framework	Securitisation framework	CCR framework	Market risk framework
1	Assets carrying value amount under the scope of prudential consolidation (as per template LI1)	4,681,992	4,626,563	6,137	31,272	18,020
2	Liabilities carrying value amount under the scope of prudential consolidation (as per template LI1)	4,136,056	22,909		123	
3	Total net amount under the scope of prudential consolidation	545,936	4,603,654	6,137	31,149	18,020
4	Off-balance-sheet amounts	450,859	450,859			
5	<i>Differences in valuations</i>	(69)				
6	<i>Differences due to different netting rules, other than those already included in row 2</i>					
7	<i>Differences due to consideration of provisions</i>	56,953	56,953			
8	<i>Differences due to the use of credit risk mitigation techniques (CRMs)</i>	20,623	20,623			
9	<i>Differences due to credit conversion factors</i>	276,004	(276,004)			
10	<i>Differences due to Securitisation with risk transfer</i>					
11	<i>Other differences</i>	8,907	8,907			
12	Exposure amounts considered for regulatory purposes	5,008,929	4,972,017		36,912	18,020

Template EU LI3 - Outline of the differences in the scopes of consolidation (entity by entity)

a	b	Method of prudential consolidation					h	
		Method of prudential consolidation						Description of the entity
		Full consolidation	Proportional consolidation	Equity method	Neither consolidated nor deducted	Deducted		
Name of the entity	Method of accounting consolidation							
Šiaulių bankas AB	Full consolidation	X					Credit institution	
SB Asset management UAB	Full consolidation	X					Fund management	
SB Turto Fondas UAB	Full consolidation	X					Real estate management	
SB lizingas UAB	Full consolidation	X					Finance lease, consumer credits	
SB Draudimas UAB	Full consolidation			X			Life insurance	
SB Modernizavimo fondas UAB	not consolidated in accordance with IFRS 10				X		Multi-apartment renovation financing	
Securitisation SB Modernizavimo fondas 2 UAB	not consolidated in accordance with IFRS 10				X		Multi-apartment renovation financing	

Table EU LIA - Explanations of differences between accounting and regulatory exposure amounts

Any differences between the amounts in columns (a) and (b) of the EU LI1 form are due to the different scope of consolidation. The Bank's consolidated financial statements consolidate all of the Bank's subsidiaries (except for the SB Modernisation Fund UAB, which is accounted for at fair value through profit or loss in accordance with the provisions of IFRS 9 applicable to linked financial instruments) with all of their respective balances of assets and liabilities, including transactions with the Bank and other Bank subsidiaries. Within the scope of prudential consolidation, the Bank does not consolidate its subsidiaries SB Draudimas UAB, but it is accounted for using the equity method.

Table EU LIB - Other qualitative information on the scope of application

The Bank Group has not identified any impediments to the prompt transfer of own funds or the settlement of the Group's liabilities. The actual own funds of all non-consolidated subsidiaries are not less than the required amount. The derogation provided for in Article 7 of the CRR or the individual consolidation method provided for in Article 9 of the CRR have not been applied.

DISCLOSURE OF OWN FUNDS

Template EU CC1 - Composition of regulatory own funds

		a)	b)
		Amounts	Source based on reference numbers/letters of the balance sheet under the regulatory scope of consolidation
Common Equity Tier 1 (CET1) capital: instruments and reserves			
1	Capital instruments and the related share premium accounts	217,803	{EU CC2, r29, b)} + {EU CC2, r30, b)}
	of which: Instrument type 1		
	of which: Instrument type 2		
	of which: Instrument type 3		
2	Retained earnings	218,252	{EU CC1, r36, b)}

(All amounts are in EUR thousand, unless otherwise stated)

3	Accumulated other comprehensive income (and other reserves)	19,171	{EU CC1, r31, b)} + {EU CC1, r33, b)}+{EU CC1, r34, b)}+{EU CC1, r35, b)}
EU-3a	Funds for general banking risk	76,112	{EU CC1, r32, b)}
4	Amount of qualifying items referred to in Article 484 (3) CRR and the related share premium accounts subject to phase out from CET1		
5	Minority interests (amount allowed in consolidated CET1)		
EU-5a	Independently reviewed interim profits net of any foreseeable charge or dividend	23,746	
6	Common Equity Tier 1 (CET1) capital before regulatory adjustments	555,084	The sum of rows 1-5a
Common Equity Tier 1 (CET1) capital: regulatory adjustments			
7	Additional value adjustments (negative amount)	(69)	
8	Intangible assets (net of related tax liability) (negative amount)	(40,569)	{EU CC1, r10, b)}
9	Not applicable		
10	Deferred tax assets that rely on future profitability excluding those arising from temporary differences (net of related tax liability where the conditions in Article 38 (3) CRR are met) (negative amount)		
11	Fair value reserves related to gains or losses on cash flow hedges of financial instruments that are not valued at fair value		
12	Negative amounts resulting from the calculation of expected loss amounts		
13	Any increase in equity that results from securitised assets (negative amount)		
14	Gains or losses on liabilities valued at fair value resulting from changes in own credit standing		
15	Defined-benefit pension fund assets (negative amount)		
16	Direct, indirect and synthetic holdings by an institution of own CET1 instruments (negative amount)	(11, 374)	
17	Direct, indirect and synthetic holdings of the CET 1 instruments of financial sector entities where those entities have reciprocal cross holdings with the institution designed to inflate artificially the own funds of the institution (negative amount)		
18	Direct, indirect and synthetic holdings by the institution of the CET1 instruments of financial sector entities where the institution does not have a significant investment in those entities (amount above 10% threshold and net of eligible short positions) (negative amount)		
19	Direct, indirect and synthetic holdings by the institution of the CET1 instruments of financial sector entities where the institution has a significant investment in those entities (amount above 10% threshold and net of eligible short positions) (negative amount)		
20	Not applicable		
EU-20a	Exposure amount of the following items which qualify for a RW of 1250%, where the institution opts for the deduction alternative		
EU-20b	of which: qualifying holdings outside the financial sector (negative amount)		
EU-20c	of which: securitisation positions (negative amount)		
EU-20d	of which: free deliveries (negative amount)		
21	Deferred tax assets arising from temporary differences (amount above 10% threshold, net of related tax liability where the conditions in Article 38 (3) CRR are met) (negative amount)		
22	Amount exceeding the 17,65% threshold (negative amount)		
23	of which: direct, indirect and synthetic holdings by the institution of the CET1 instruments of financial sector entities where the institution has a significant investment in those entities		
24	Not applicable		
25	of which: deferred tax assets arising from temporary differences		
EU-25a	Losses for the current financial year (negative amount)		
EU-25b	Foreseeable tax charges relating to CET1 items except where the institution suitably adjusts the amount of CET1 items insofar as such tax charges		

(All amounts are in EUR thousand, unless otherwise stated)

	reduce the amount up to which those items may be used to cover risks or losses (negative amount)		
26	Not applicable		
27	Qualifying AT1 deductions that exceed the AT1 items of the institution (negative amount)		
27a	Other regulatory adjustments	8,833	
28	Total regulatory adjustments to Common Equity Tier 1 (CET1)	(43,179)	Sum of rows 7-20a, 21, 22 and 25a-27a
29	Common Equity Tier 1 (CET1) capital	511,905	The sum of rows 6 and 28
Additional Tier 1 (AT1) capital: instruments			
30	Capital instruments and the related share premium accounts	50,145	
31	of which: classified as equity under applicable accounting standards		
32	of which: classified as liabilities under applicable accounting standards	50,145	
33	Amount of qualifying items referred to in Article 484 (4) CRR and the related share premium accounts subject to phase out from AT1		
EU-33a	Amount of qualifying items referred to in Article 494a(1) CRR subject to phase out from AT1		
EU-33b	Amount of qualifying items referred to in Article 494b(1) CRR subject to phase out from AT1		
34	Qualifying Tier 1 capital included in consolidated AT1 capital (including minority interests not included in row 5) issued by subsidiaries and held by third parties		
35	of which: instruments issued by subsidiaries subject to phase out		
36	Additional Tier 1 (AT1) capital before regulatory adjustments	50,145	Sum of rows 30, 33 and 34
Additional Tier 1 (AT1) capital: regulatory adjustments			
37	Direct, indirect and synthetic holdings by an institution of own AT1 instruments (negative amount)		
38	Direct, indirect and synthetic holdings of the AT1 instruments of financial sector entities where those entities have reciprocal cross holdings with the institution designed to inflate artificially the own funds of the institution (negative amount)		
39	Direct, indirect and synthetic holdings of the AT1 instruments of financial sector entities where the institution does not have a significant investment in those entities (amount above 10% threshold and net of eligible short positions) (negative amount)		
40	Direct, indirect and synthetic holdings by the institution of the AT1 instruments of financial sector entities where the institution has a significant investment in those entities (net of eligible short positions) (negative amount)		
41	Not applicable		
42	Qualifying T2 deductions that exceed the T2 items of the institution (negative amount)		
42a	Other regulatory adjustments to AT1 capital		
43	Total regulatory adjustments to Additional Tier 1 (AT1) capital	-	Sum of rows 37 to 42
44	Additional Tier 1 (AT1) capital	50,145	max(0, [row 36 minus row 43])
45	Tier 1 capital (T1 = CET1 + AT1)	562,050	Sum of rows 29 and r44
Tier 2 (T2) capital: instruments			
46	Capital instruments and the related share premium accounts	98,072	From {EU CC1, r22, b)} minus {EU CC1, r22a, b)}
47	Amount of qualifying items referred to in Article 484(5) CRR and the related share premium accounts subject to phase out from T2 as described in Article 486(4) CRR		
EU-47a	Amount of qualifying items referred to in Article 494a(2) CRR subject to phase out from T2		
EU-47b	Amount of qualifying items referred to in Article 494b(2) CRR subject to phase out from T2		

(All amounts are in EUR thousand, unless otherwise stated)

48	Qualifying own funds instruments included in consolidated T2 capital (including minority interests and AT1 instruments not included in rows 5 or 34) issued by subsidiaries and held by third parties		
49	of which: instruments issued by subsidiaries subject to phase out		
50	Credit risk adjustments		
51	Tier 2 (T2) capital before regulatory adjustments	98,072	Sum of rows 46, 47, 47a, 47b 48 and 50
Tier 2 (T2) capital: regulatory adjustments			
52	Direct, indirect and synthetic holdings by an institution of own T2 instruments and subordinated loans (negative amount)		
53	Direct, indirect and synthetic holdings of the T2 instruments and subordinated loans of financial sector entities where those entities have reciprocal cross holdings with the institution designed to inflate artificially the own funds of the institution (negative amount)		
54	Direct, indirect and synthetic holdings of the T2 instruments and subordinated loans of financial sector entities where the institution does not have a significant investment in those entities (amount above 10% threshold and net of eligible short positions) (negative amount)		
54a	Not applicable		
55	Direct, indirect and synthetic holdings by the institution of the T2 instruments and subordinated loans of financial sector entities where the institution has a significant investment in those entities (net of eligible short positions) (negative amount)		
56	Not applicable		
EU-56a	Qualifying eligible liabilities deductions that exceed the eligible liabilities items of the institution (negative amount)		
EU-56b	Other regulatory adjustments to T2 capital	(88)	
57	Total regulatory adjustments to Tier 2 (T2) capital	(88)	Sum of rows 52-56b
58	Tier 2 (T2) capital	97,984	max(0, [51 row minus 57 row])
59	Total capital (TC = T1 + T2)	660,034	Sum of rows 45 and 58
60	Total Risk exposure amount	2,706,609	
Capital ratios and requirements including buffers			
61	Common Equity Tier 1 capital	18.91%	
62	Tier 1 capital	20.77%	
63	Total capita	24.39%	
64	Institution CET1 overall capital requirements	10.37%	
65	of which: capital conservation buffer requirement	2.50%	
66	of which: countercyclical capital buffer requirement	1.00%	
67	of which: systemic risk buffer requirement	0.22%	
EU-67a	of which: Global Systemically Important Institution (G-SII) or Other Systemically Important Institution (O-SII) buffer requirement	1.00%	
EU-67b	of which: additional own funds requirements to address the risks other than the risk of excessive leverage	1.15%	
68	Common Equity Tier 1 capital (as a percentage of risk exposure amount) available after meeting the minimum capital requirements	13.23%	{C 03.00, r0220, c0010} / {C 02.00, r0010, c0010}
National minima (if different from Basel III)			
69	Not applicable		
70	Not applicable		
71	Not applicable		
Amounts below the thresholds for deduction (before risk weighting)			
72	Direct and indirect holdings of own funds and eligible liabilities of financial sector entities where the institution does not have a significant investment in those entities (amount below 10% threshold and net of eligible short positions)		
73	Direct and indirect holdings by the institution of the CET1 instruments of financial sector entities where the institution has a significant investment in		

(All amounts are in EUR thousand, unless otherwise stated)

	those entities (amount below 17.65% thresholds and net of eligible short positions)		
74	Not applicable		
75	Deferred tax assets arising from temporary differences (amount below 17,65% threshold, net of related tax liability where the conditions in Article 38 (3) CRR are met)		
Applicable caps on the inclusion of provisions in Tier 2			
76	Credit risk adjustments included in T2 in respect of exposures subject to standardised approach (prior to the application of the cap)		
77	Cap on inclusion of credit risk adjustments in T2 under standardised approach		
78	Credit risk adjustments included in T2 in respect of exposures subject to internal ratings-based approach (prior to the application of the cap)		
79	Cap for inclusion of credit risk adjustments in T2 under internal ratings-based approach		
Capital instruments subject to phase-out arrangements (only applicable between 1 Jan 2014 and 1 Jan 2022)			
80	Current cap on CET1 instruments subject to phase out arrangements		
81	Amount excluded from CET1 due to cap (excess over cap after redemptions and maturities)		
82	Current cap on AT1 instruments subject to phase out arrangements		
83	Amount excluded from AT1 due to cap (excess over cap after redemptions and maturities)		
84	Current cap on T2 instruments subject to phase out arrangements		
85	Amount excluded from T2 due to cap (excess over cap after redemptions and maturities)		

Template EU CC2 - reconciliation of regulatory own funds to balance sheet in the audited financial statements

	a	b	c	
	Balance sheet as in published financial statements	Under regulatory scope of consolidation	Reference	
	31-12-2024	31-12-2024		
Assets - Breakdown by asset classes according to the balance sheet in the published financial statements				
1	Cash and cash equivalents	395,136	387,680	
2	Securities in the trading book	235,110	18,020	
3	Due from other banks	3,121	3,121	
4	Derivative financial instruments	1,093	1,093	
5	Loans to customers	3,117,700	3,117,700	
6	Finance lease receivables	316,897	316,897	
7	Investment securities at fair value	43,868	43,868	
8	Investment securities held to collect cash flows	726,937	716,864	
9	Investments in subsidiaries and associates	270	38,180	
10	Intangible assets	43,617	40,569	{EU CC1, r8, a)}
11	Property, plant and equipment	15,261	15,070	
12	Investment property	-	-	
13	Current income tax prepayment	82	82	
14	Deferred income tax asset	6,076	6,074	
15	Assets classified as held for sale	17,301	17,193	
16	Other assets	150	150	
17	Total assets	4,922,619	4,722,561	

(All amounts are in EUR thousand, unless otherwise stated)

Liabilities - Breakdown by liability classes according to the balance sheet in the published financial statements				
18	Due to other banks and financial institutions	65,860	67,926	
19	Derivative financial instruments	123	123	
20	Due to customers	3,537,972	3,537,972	
21	Debt securities in issue	448,159	448,159	
21a	of which: subordinated debt securities	98,072	98,072	{EU CC1, r46, a)}
22	Special and lending funds	23,037	23,037	
23	Current income tax liabilities	303	206	
24	Deferred income tax liabilities	6,141	6,141	
25	Liabilities related to insurance activities	198,432	-	
26	Other liabilities	57,420	52,492	
27	Liabilities related to assets classified as held for sale	-	-	
28	Total liabilities	4 337 447	4 136 056	
Shareholders' Equity				
29	Share capital	192,269	192,269	{EU CC1, r1, a)}
30	Share premium	25,534	25,534	{EU CC1, r1, a)}
31	Treasury shares (-)	(8,375)	(8,375)	{EU CC1, r16, a)}
32	Reserve capital	756	756	{EU CC1, r3, a)}
33	Statutory reserve	61,027	60,904	{EU CC1, rEU-3a, a)}
34	Reserve for acquisition of own shares	20,000	20,000	{EU CC1, r3, a)}
35	Accumulated other comprehensive income	(2,989)	(2,989)	{EU CC1, r3, a)}
36	Other equity	1,480	1,404	{EU CC1, r3, a)}
37	Previous years retained earnings	216,682	218,252	{EU CC1, r2, a)}
38	Profit for the current year	78,788	78,750	
39	Total shareholders' equity	585,172	586,505	

Template EU CCA: Main features of regulatory own funds instruments and eligible liabilities instruments

		a			
		Qualitative or quantitative information - Free format			
1	Issuer	Šiaulių bankas AB	Šiaulių bankas AB	Šiaulių bankas AB	Šiaulių bankas AB
2	Unique identifier (e.g. CUSIP, ISIN or Bloomberg identifier for private placement)	LT0000102253	LT0000404287	LT0000407751	LT0000405771
2a	Public or private placement	Public	Public	Public	Public
3	Governing law(s) of the instrument	The Republic of Lithuania	The Republic of Lithuania	The Republic of Lithuania	The Republic of Lithuania
3a	Contractual recognition of write down and conversion powers of resolution authorities	No	Yes	Yes	Yes
Regulatory treatment					
4	Current treatment taking into account, where applicable, transitional CRR rules	Common equity tier 1 capital	Tier 2 capital	Tier 2 capital	N/A
5	Post-transitional CRR rules	Common equity tier 1 capital	Tier 2 capital	Tier 2 capital	Eligible liabilities
6	Eligible at solo/(sub-)consolidated/ solo&(sub-) consolidated	solo & (sub-) consolidated	solo & (sub-) consolidated	solo & (sub-) consolidated	solo & (sub-) consolidated
7	Instrument type (types to be specified by each jurisdiction)	Ordinary registered shares	Subordinated debt securities (CRR Article 62 (a))	Subordinated debt securities (CRR Article 62 (a))	Restricted senior bonds (CRR Article 72a (1) (a))
8	Amount recognised in regulatory capital or eligible liabilities (Currency in million, as of most recent reporting date)	EUR 192.27	EUR 20.00	EUR 50.00	EUR 206.45
9	Nominal amount of instrument	EUR 192,269,027.34	EUR 20,000,000.00	EUR 50,000,000.00	EUR 210,000,000.00
EU-9a	Issue price	EUR 0.29	EUR 10,000.00	EUR 1,000.00	EUR 983.11

(All amounts are in EUR thousand, unless otherwise stated)

EU-9b	Redemption price	N/A	EUR 10,000.00	EUR 1,000.00	EUR 1,000.00
10	Accounting classification	Equity	Liability - amortized cost	Liability - amortized cost	Liability - amortized cost
11	Original date of issuance	29-11-1994	23-12-2019	22-06-2023	07-10-2021
12	Perpetual or dated	Perpetua	Fixed term	Fixed term	Fixed term
13	Original maturity date	No maturity	23-12-2019	22-06-2033	07-10-2021
14	Issuer call subject to prior supervisory approval	No	Yes	Yes	Yes
15	Optional call date, contingent call dates and redemption amount	N/A	From 23/12/2024 at nominal value	From 22/06/2028 at nominal value	2024-10-07
16	Subsequent call dates, if applicable	N/A	From 23/12/2024 at nominal value with 30 days' notice	From 22/06/2028 at nominal value with 30 days' notice	N/A
	<i>Coupons / dividends</i>				
17	Fixed or floating dividend/coupon	Floating	Fixed	Fixed	Fixed, which will be replaced floating format
18	Coupon rate and any related index	N/A	6.15%	10.75%; after 22/06/2028 5 year Mid-Swap Rate + 750 bps	1.047%; after 07/10/2024 Bloomberg EUSA1 + 140 bps
19	Existence of a dividend stopper	No	Ne	Ne	Ne
EU-20a	Fully discretionary, partially discretionary or mandatory (in terms of timing))	Partially discretionary	Mandatory	Mandatory	Mandatory
EU-20b	Fully discretionary, partially discretionary or mandatory (in terms of amount)	Partially discretionary	Mandatory	Mandatory	Mandatory
21	Existence of step up or other incentive to redeem	N/A	N/A	N/A	N/A
22	Noncumulative or cumulative	Noncumulative	Noncumulative	Noncumulative	Noncumulative
23	Convertible or non-convertible	Non-convertible	Convertible	Convertible	Convertible
24	If convertible, conversion trigger(s)	N/A	Deterioration of the bank's financial condition in order to maintain the stability of the financial sector. May be initiated by the supervisory authority. A contractual approach	Deterioration of the bank's financial condition in order to maintain the stability of the financial sector. May be initiated by the supervisory authority. A contractual approach	Deterioration of the bank's financial condition in order to maintain the stability of the financial sector. May be initiated by the supervisory authority. A statutory approach and a contractual approach
25	If convertible, fully or partially	N/A	Fully or partially	Fully or partially	Fully or partially
26	If convertible, conversion rate	N/A	Not specified in emission conditions	Not specified in emission conditions	Not specified in emission conditions
27	If convertible, mandatory or optional conversion	N/A	N/A	N/A	N/A
28	If convertible, specify instrument type convertible into	N/A	Common Equity Tier 1	Common Equity Tier 1	Common Equity Tier 1; Additional Tier 1; Tier 2
29	If convertible, specify issuer of instrument it converts into	N/A	Šiaulių bankas AB	Šiaulių bankas AB	Šiaulių bankas AB
30	Write-down features	No	Yes	Yes	Yes
31	If write-down, write-down trigger(s)	N/A	Deterioration of the bank's financial condition in order to maintain the stability of the financial sector. May be initiated by the supervisory authority. A contractual approach	Deterioration of the bank's financial condition in order to maintain the stability of the financial sector. May be initiated by the supervisory authority. A contractual approach	Deterioration of the bank's financial condition in order to maintain the stability of the financial sector. May be initiated by the supervisory authority. A statutory approach and a contractual approach
32	If write-down, full or partial	N/A	Fully or Partially	Fully or Partially	Fully or Partially

(All amounts are in EUR thousand, unless otherwise stated)

33	If write-down, permanent or temporary	N/A	Permanent	Permanent	Permanent
34	If temporary write-down, description of write-up mechanism	N/A	N/A	N/A	N/A
34a	Type of subordination (only for eligible liabilities)	[Statutory] if the instrument meets the requirements set out in point (d)(ii) of Article 72b(2) CRR	[Contractual] if the instrument meets the requirements set out in point (d)(i) of Article 72b(2) CRR	[Contractual] if the instrument meets the requirements set out in point (d)(i) of Article 72b(2) CRR	[Contractual] if the instrument meets the requirements set out in point (d)(i) of Article 72b(2) CRR
EU-34b	Ranking of the instrument in normal insolvency proceedings	1	3	3	5
35	Position in subordination hierarchy in liquidation (specify instrument type immediately senior to instrument)	Subordinated	Other	Other	Dep-ISME
36	Non-compliant transitioned features	No	No	No	No
37	If yes, specify non-compliant features	N/A	N/A	N/A	N/A
37a	Link to the full term and conditions of the instrument (signposting)	https://nasdaqbaltic.com/statistics/lt/instrument/LT0000102253/company?date=2022-02-03	https://nasdaqbaltic.com/statistics/lt/instrument/LT0000404287/company?date=2024-02-02	https://nasdaqbaltic.com/statistics/lt/instrument/LT0000404287/company?date=2024-02-02	https://nasdaqbaltic.com/statistics/lt/instrument/LT0000404287/company?date=2024-02-02
(1) Insert 'N/A' if the question is not applicable.					

		a Kokybinė arba kiekybinė informacija. Laisva forma		
1	Issuer	AB Šiaulių bankas	AB Šiaulių bankas	AB Šiaulių bankas
2	Unique identifier (e.g. CUSIP, ISIN or Bloomberg identifier for private placement)	LT0000102253	LT0000404287	LT0000407751
2a	Public or private placement	Public	Public	Public
3	Governing law(s) of the instrument	Republic of Lithuania	Republic of Lithuania	Republic of Lithuania
3a	Contractual recognition of write down and conversion powers of resolution authorities	No	Yes	Yes
<i>Regulatory treatment</i>				
4	Current treatment taking into account, where applicable, transitional CRR rules	Common equity tier 1 capital	Tier 2 capital	Tier 2 capital
5	Post-transitional CRR rules	Common equity tier 1 capital	Tier 2 capital	Tier 2 capital
6	Eligible at solo/(sub-)consolidated/ solo&(sub-) consolidated	solo & (sub-) consolidated	solo & (sub-) consolidated	solo & (sub-) consolidated
7	Instrument type (types to be specified by each jurisdiction)	Ordinary registered shares	Subordinated debt securities (CRR Article 62 (a))	Subordinated debt securities (CRR Article 62 (a))
8	Amount recognised in regulatory capital or eligible liabilities (Currency in million, as of most recent reporting date)	EUR 192.27	EUR 20.00	EUR 50.00
9	Nominal amount of instrument	EUR 192,269,027.34	EUR 20,000,000.00	EUR 50,000,000.00
EU-9a	Issue price	EUR 0.29	EUR 10,000.00	EUR 1,000.00
EU-9b	Redemption price	N/A	EUR 10,000.00	EUR 1,000.00
10	Accounting classification	Equity	Liability - amortized cost	Liability - amortized cost
11	Original date of issuance	29-11-1994	23-12-2019	22-06-2023
12	Perpetual or dated	Perpetua	Fixed term	Fixed term
13	Original maturity date	No maturity	23-12-2019	22-06-2033
14	Issuer call subject to prior supervisory approval	No	Yes	Yes
15	Optional call date, contingent call dates and redemption amount	N/A	From 23/12/2024 at nominal value	From 22/06/2028 at nominal value
16	Subsequent call dates, if applicable	N/A	From 23/12/2024 at nominal value with 30 days' notice	From 22/06/2028 at nominal value with 30 days' notice
<i>Coupons / dividends</i>				

(All amounts are in EUR thousand, unless otherwise stated)

		Floating	Fixed	Fixed
17	Fixed or floating dividend/coupon			
18	Coupon rate and any related index	N/A	6.15%	10.75%; after 22/06/2028 5 year Mid-Swap Rate + 750 bps
19	Existence of a dividend stopper	No	Ne	Ne
EU-20a	Fully discretionary, partially discretionary or mandatory (in terms of timing))	Partially discretionary	Mandatory	Mandatory
EU-20b	Fully discretionary, partially discretionary or mandatory (in terms of amount)	Partially discretionary	Mandatory	Mandatory
21	Existence of step up or other incentive to redeem	N/A	N/A	N/A
22	Noncumulative or cumulative	Noncumulative	Noncumulative	Noncumulative
23	Convertible or non-convertible	Non-convertible	Convertible	Convertible
24	If convertible, conversion trigger(s)	N/A	Deterioration of the bank's financial condition in order to maintain the stability of the financial sector. May be initiated by the supervisory authority. A contractual approach	Deterioration of the bank's financial condition in order to maintain the stability of the financial sector. May be initiated by the supervisory authority. A contractual approach
25	If convertible, fully or partially	N/A	Fully or partially	Fully or partially
26	If convertible, conversion rate	N/A	Not specified in emission conditions	Not specified in emission conditions
27	If convertible, mandatory or optional conversion	N/A	N/A	N/A
28	If convertible, specify instrument type convertible into	N/A	Common Equity Tier 1	Common Equity Tier 1
29	If convertible, specify issuer of instrument it converts into	N/A	Šiaulių bankas AB	Šiaulių bankas AB
30	Write-down features	No	Yes	Yes
31	If write-down, write-down trigger(s)	N/A	Deterioration of the bank's financial condition in order to maintain the stability of the financial sector. May be initiated by the supervisory authority. A contractual approach	Deterioration of the bank's financial condition in order to maintain the stability of the financial sector. May be initiated by the supervisory authority. A contractual approach
32	If write-down, full or partial	N/A	Fully or Partially	Fully or Partially
33	If write-down, permanent or temporary	N/A	Permanent	Permanent
34	If temporary write-down, description of write-up mechanism	N/A	N/A	N/A
34a	Type of subordination (only for eligible liabilities)	[Statutory] if the instrument meets the requirements set out in point (d)(ii) of Article 72b(2) CRR	[Contractual] if the instrument meets the requirements set out in point (d)(i) of Article 72b(2) CRR	[Contractual] if the instrument meets the requirements set out in point (d)(i) of Article 72b(2) CRR
EU-34b	Ranking of the instrument in normal insolvency proceedings	1	3	3
35	Position in subordination hierarchy in liquidation (specify instrument type immediately senior to instrument)	Additional Tier 1 capital	Other	Other
36	Non-compliant transitioned features	No	No	No
37	If yes, specify non-compliant features	N/A	N/A	N/A
37a	Link to the full term and conditions of the instrument (signposting)	https://nasdaqbaltic.com/statistics/lt/instrument/LT0000102253/company?date=2022-02-03	https://nasdaqbaltic.com/statistics/lt/instrument/LT0000404287/company?date=2024-02-02	https://nasdaqbaltic.com/statistics/lt/instrument/LT0000407751/company?date=2024-02-02

(All amounts are in EUR thousand, unless otherwise stated)

(continued)		a Kokybinė arba kiekybinė informacija. Laisva forma		
1	Issuer	AB Šiaulių bankas	AB Šiaulių bankas	AB Šiaulių bankas
2	Unique identifier (e.g. CUSIP, ISIN or Bloomberg identifier for private placement)	LT0000409013	XS2887816564	XS2922133363
2a	Public or private placement	Public	Public	Public
3	Governing law(s) of the instrument	Republic of Lithuania	England and Republic of Lithuania	England and Republic of Lithuania
3a	Contractual recognition of write down and conversion powers of resolution authorities	Yes	Yes	Yes
Regulatory treatment				
4	Current treatment taking into account, where applicable, transitional CRR rules	Tier 2 capital	Eligible commitments	Additional Tier 1 capital
5	Post-transitional CRR rules	Tier 2 capital	Eligible commitments	Additional Tier 1 capital
6	Eligible at solo/(sub-)consolidated/ solo&(sub-) consolidated	solo & (sub-) consolidated	solo & (sub-) consolidated	solo & (sub-) consolidated
7	Instrument type (types to be specified by each jurisdiction)	Subordinated debt securities (CRR Article 62(a))	Senior Preferred Eurobonds (Article 72b of CRR)	Perpetual additional tier 1 temporary write down notes (Article 52 of CRR)
8	Amount recognised in regulatory capital or eligible liabilities (Currency in million, as of most recent reporting date)	25.00 €	300.00 €	50.00 €
9	Nominal amount of instrument	25,000,000.00 €	300,000,000.00 €	50,000,000.00 €
EU-9a	Issue price	1,000.00 €	1,000.00 €	1,000.00 €
EU-9b	Redemption price	1,000.00 €	1,000.00 €	1,000.00 €
10	Accounting classification	Liability - amortized cost	Liability - amortized cost	Liability - amortized cost
11	Original date of issuance	2024.05.22	2024.09.05	2024.10.17
12	Perpetual or dated	Fixed term	Fixed term	Perpetua
13	Original maturity date	2034.05.22	2028.12.05	Perpetua
14	Issuer call subject to prior supervisory approval	Yes	Yes	Yes
15	Optional call date, contingent call dates and redemption amount	From 22/05/2029 at nominal value	2027.12.05	2029.10.07
16	Subsequent call dates, if applicable	From 22/05/2029 at nominal value with a minimum of 30 days and a maximum of 60 days' notice	No	No
Coupons / dividends				
17	Fixed or floating dividend/coupon	Fixed	Fixed, which will be replaced floating format	Fixed
18	Coupon rate and any related index	7.70%;	4.853%; nuo 05/12/2027 1-year EUR Mid-Swap + 235 bps	8.75%;
19	Existence of a dividend stopper	No	No	No
EU-20a	Fully discretionary, partially discretionary or mandatory (in terms of timing))	Mandatory	Mandatory	Mandatory
EU-20b	Fully discretionary, partially discretionary or mandatory (in terms of amount)	Mandatory	Mandatory	Mandatory
21	Existence of step up or other incentive to redeem	N/A	N/A	N/A
22	Noncumulative or cumulative	Noncumulative	Noncumulative	Noncumulative
23	Convertible or non-convertible	Convertible	Convertible	Non-convertible
24	If convertible, conversion trigger(s)	Deterioration of the bank's financial condition in order to maintain the stability of the financial sector. May be initiated by the supervisory	Deterioration of the bank's financial condition in order to maintain the stability of the financial sector. May be initiated by the supervisory authority. A statutory	N/A

(All amounts are in EUR thousand, unless otherwise stated)

		authority. A contractual approach	approach and a contractual approach	
25	If convertible, fully or partially	Fully or partially	Fully or partially	N/A
26	If convertible, conversion rate	Not specified in emission conditions	Not specified in emission conditions	N/A
27	If convertible, mandatory or optional conversion	N/A	N/A	N/A
28	If convertible, specify instrument type convertible into	Common Equity Tier 1	Common Equity Tier 1	N/A
29	If convertible, specify issuer of instrument it converts into	Šiaulių bankas AB	Šiaulių bankas AB	N/A
30	Write-down features	Yes	Yes	Yes
31	If write-down, write-down trigger(s)	Deterioration of the bank's financial condition in order to maintain the stability of the financial sector. May be initiated by the supervisory authority. A contractual approach	Deterioration of the bank's financial condition in order to maintain the stability of the financial sector. May be initiated by the supervisory authority. A statutory approach and a contractual approach	Deterioration of the bank's financial condition in order to maintain the stability of the financial sector. May be initiated by the supervisory authority. A statutory approach and a contractual approach. Common Equity Tier 1 falls below 5.125%
32	If write-down, full or partial	Fully or Partially	Fully or Partially	Fully or Partially
33	If write-down, permanent or temporary	Permanent	Permanent	Temporary
34	If temporary write-down, description of write-up mechanism	N/A	N/A	Pro rata p principle
34a	Type of subordination (only for eligible liabilities)	[Contractual] if the instrument meets the requirements set out in point (d)(i) of Article 72b(2) CRR	[Contractual] if the instrument meets the requirements set out in point (d)(i) of Article 72b(2) CRR	[Contractual] if the instrument meets the requirements set out in point (d)(i) of Article 72b(2) CRR
EU-34b	Ranking of the instrument in normal insolvency proceedings	3	4	2
35	Position in subordination hierarchy in liquidation (specify instrument type immediately senior to instrument)	Other	Dep-ISME	Tier 2 capital
36	Non-compliant transitioned features	No	No	No
37	If yes, specify non-compliant features	N/A	N/A	N/A
37a	Link to the full term and conditions of the instrument (signposting)	https://nasdaqbaltic.com/statistics/lt/instrument/LT0000404287/company?date=2024-02-02	- Euronext exchange Live quotes	https://live.euronext.com/en/product/bonds-detail/32806/documents
(1) Insert 'N/A' if the question is not applicable.				

COUNTERCYCLICAL CAPITAL BUFFERS

Template EU CCyB1 - Geographical distribution of credit exposures relevant for the calculation of the countercyclical buffer

	a	b	c	d	e	f
	General credit exposures		Relevant credit exposures – Market risk		Securitisati on exposures Exposure value for non-trading book	Total exposure value
	Exposure value under the standardised approach	Exposure value under the IRB approach	Sum of long and short positions of trading book exposures for SA	Value of trading book exposures for internal models		
010	Lithuania	2,408,728		11,175	105,950	2,525,853
011	USA	4,543				4,543

(All amounts are in EUR thousand, unless otherwise stated)

012	France	4,040					4,040
013	Latvia	3,524					3,524
014	Luxembourg	2,000					2,000
015	Switzerland	1,407					1,407
016	Italy	1,189					1,189
017	Great Britain	1,082					1,082
018	Netherlands	1,067					1,067
019	Czech Republic	1,045					1,045
020	Other	940		469			1,409
021	Total	2,429,565		11,644		105,950	2,547,159

(continued)

	g	h	i	j	k	l	m	
	Own fund requirements							
	Relevant credit risk exposures - Credit risk	Relevant credit exposures - Market risk	Relevant credit exposures - Securitisation positions in the non-trading book	Total	Risk-weighted exposure amounts	Own fund requirements weights (%)	Countercyclical buffer rate (%)	
010	Lithuania	192,698	912	8,476	202,086	315,732	99.16%	1.00%
011	USA	363			363	568	0.18%	0.00%
012	France	323			323	505	0.16%	1.00%
013	Latvia	282			282	440	0.14%	0.50%
014	Luxembourg	160			160	250	0.08%	0.50%
015	Switzerland	113			113	176	0.06%	0.00%
016	Italy	95			95	149	0.05%	0.00%
017	Great Britain	87			87	135	0.04%	2.00%
018	Netherlands	85			85	133	0.04%	2.00%
019	Czech Republic	84			84	131	0.04%	1.25%
021	Other	75	40		115	176	0.06%	0.00%
022	Total	194,365	952	8,476	203,793	318,395	100%	

Template EU CCyB2 - Amount of institution-specific countercyclical capital buffer

	a	
010	Total risk exposure amount	2,706,609
020	Institution specific countercyclical capital buffer rate	0.9971%
030	Institution specific countercyclical capital buffer requirement	26,988

LEVERAGE RATIO

Template EU LR1 - LRSum: Summary reconciliation of accounting assets and leverage ratio exposures

	a	
	Applicable amount	
1	Total assets as per published financial statements	4,922,619
2	Adjustment for entities which are consolidated for accounting purposes but are outside the scope of prudential consolidation	(200,058)

(All amounts are in EUR thousand, unless otherwise stated)

3	(Adjustment for securitised exposures that meet the operational requirements for the recognition of risk transference)	
4	(Adjustment for temporary exemption of exposures to central banks (if applicable))	
5	(Adjustment for fiduciary assets recognised on the balance sheet pursuant to the applicable accounting framework but excluded from the total exposure measure in accordance with point (i) of Article 429a(1) CRR)	
6	Adjustment for regular-way purchases and sales of financial assets subject to trade date accounting	
7	Adjustment for eligible cash pooling transactions	
8	Adjustment for derivative financial instruments	6,761
9	Adjustment for securities financing transactions (SFTs)	(38)
10	Adjustment for off-balance sheet items (ie conversion to credit equivalent amounts of off-balance sheet exposures)	450,859
11	(Adjustment for prudent valuation adjustments and specific and general provisions which have reduced Tier 1 capital)	(69)
EU-11a	(Adjustment for exposures excluded from the total exposure measure in accordance with point (c) of Article 429a(1) CRR)	
EU-11b	(Adjustment for exposures excluded from the total exposure measure in accordance with point (j) of Article 429a(1) CRR)	
12	Other adjustments	(171,288)
13	Total exposure measure	5,008,786

Template EU LR2 - LRCom: Leverage ratio common disclosure

		CRR leverage ratio exposures	
		a	b
		31-12-2024	30-06-2024
On-balance sheet exposures (excluding derivatives and SFTs)			
1	On-balance sheet items (excluding derivatives, SFTs, but including collateral)	4,561,727	4,691,833
2	Gross-up for derivatives collateral provided, where deducted from the balance sheet assets pursuant to the applicable accounting framework		
3	(Deductions of receivables assets for cash variation margin provided in derivatives transactions)		
4	(Adjustment for securities received under securities financing transactions that are recognised as an asset)		
5	(General credit risk adjustments to on-balance sheet items)		
6	(Asset amounts deducted in determining Tier 1 capital)	(40,712)	(42,078)
7	Total on-balance sheet exposures (excluding derivatives and SFTs)	4,521,015	4,649,755
Derivative exposures			
8	Replacement cost associated with SA-CCR derivatives transactions (i.e. net of eligible cash variation margin)		
EU-8a	Derogation for derivatives: replacement costs contribution under the simplified standardised approach		
9	Add-on amounts for potential future exposure associated with SA-CCR derivatives transactions		
EU-9a	Derogation for derivatives: Potential future exposure contribution under the simplified standardised approach	6,761	7,494
EU-9b	Exposure determined under Original Exposure Method		
10	(Exempted CCP leg of client-cleared trade exposures) (SA-CCR)		
EU-10a	(Exempted CCP leg of client-cleared trade exposures) (simplified standardised approach)		
EU-10b	(Exempted CCP leg of client-cleared trade exposures) (Original Exposure Method)		
11	Adjusted effective notional amount of written credit derivatives		
12	(Adjusted effective notional offsets and add-on deductions for written credit derivatives)		
13	Total derivatives exposures	6,761	7,494
Securities financing transaction (SFT) exposures			
14	Gross SFT assets (with no recognition of netting), after adjustment for sales accounting transactions	30,189	29,678

(All amounts are in EUR thousand, unless otherwise stated)

15	(Netted amounts of cash payables and cash receivables of gross SFT assets)	(38)	(30)
16	Counterparty credit risk exposure for SFT assets		
EU-16a	Derogation for SFTs: Counterparty credit risk exposure in accordance with Articles 429e(5) and 222 CRR		
17	Agent transaction exposures		
EU-17a	(Exempted CCP leg of client-cleared SFT exposure)		
18	Total securities financing transaction exposures	30,151	29,648
Other off-balance sheet exposures			
19	Off-balance sheet exposures at gross notional amount	450,859	569,429
20	(Adjustments for conversion to credit equivalent amounts)		
21	(General provisions deducted in determining Tier 1 capital and specific provisions associated with off-balance sheet exposures)		
22	Off-balance sheet exposures	450,859	569,429
Excluded exposures			
EU-22a	(Exposures excluded from the total exposure measure in accordance with point (c) of Article 429a(1) CRR)		
EU-22b	(Exposures exempted in accordance with point (j) of Article 429a(1) CRR (on and off balance sheet))		
EU-22c	(Excluded exposures of public development banks (or units) - Public sector investments)		
EU-22d	(Excluded exposures of public development banks (or units) - Promotional loans)		
EU-22e	(Excluded passing-through promotional loan exposures by non-public development banks (or units))		
EU-22f	(Excluded guaranteed parts of exposures arising from export credits)		
EU-22g	(Excluded excess collateral deposited at triparty agents)		
EU-22h	(Excluded CSD related services of CSD/institutions in accordance with point (o) of Article 429a(1) CRR)		
EU-22i	(Excluded CSD related services of designated institutions in accordance with point (p) of Article 429a(1) CRR)		
EU-22j	(Reduction of the exposure value of pre-financing or intermediate loans)		
EU-22k	(Total exempted exposures)		
Capital and total exposure measure			
23	Tier 1 capital	562,050	459,166
24	Total exposure measure	5,008,786	5,256,326
Leverage ratio			
25	Leverage ratio (%)	11.22%	8.74%
EU-25	Leverage ratio (excluding the impact of the exemption of public sector investments and promotional loans) (%)	11.22%	8.74%
25a	Leverage ratio (excluding the impact of any applicable temporary exemption of central bank reserves) (%)	11.22%	8.74%
26	Regulatory minimum leverage ratio requirement (%)	3.00%	3.00%
EU-26a	Additional own funds requirements to address the risk of excessive leverage (%)	0.00%	0.00%
EU-26b	of which: to be made up of CET1 capital	0.00%	0.00%
27	Leverage ratio buffer requirement (%)	0.00%	0.00%
EU-27a	Overall leverage ratio requirement (%)	3.00%	3.00%
Choice on transitional arrangements and relevant exposures			
EU-27b	Choice on transitional arrangements for the definition of the capital measure		
Disclosure of mean values			
28	Mean of daily values of gross SFT assets, after adjustment for sale accounting transactions and netted of amounts of associated cash payables and cash receivable	32,427	27,785
29	Quarter-end value of gross SFT assets, after adjustment for sale accounting transactions and netted of amounts of associated cash payables and cash receivables	30,151	29,648
30	Total exposure measure (including the impact of any applicable temporary exemption of central bank reserves) incorporating mean values from row 28 of gross SFT assets (after adjustment for sale accounting transactions and netted of amounts of associated cash payables and cash receivables)	5,011,062	5,262,465

30a	Total exposure measure (excluding the impact of any applicable temporary exemption of central bank reserves) incorporating mean values from row 28 of gross SFT assets (after adjustment for sale accounting transactions and netted of amounts of associated cash payables and cash receivables)	5,011,062	5,262,465
31	Leverage ratio (including the impact of any applicable temporary exemption of central bank reserves) incorporating mean values from row 28 of gross SFT assets (after adjustment for sale accounting transactions and netted of amounts of associated cash payables and cash receivables)	11.22%	8.73%
31a	Leverage ratio (excluding the impact of any applicable temporary exemption of central bank reserves) incorporating mean values from row 28 of gross SFT assets (after adjustment for sale accounting transactions and netted of amounts of associated cash payables and cash receivables)	11.22%	8.73%

Template EU LR3 - LRSpl: Split-up of on balance sheet exposures (excluding derivatives, SFTs and exempted exposures)

		a
		CRR leverage ratio exposures
EU-1	Total on-balance sheet exposures (excluding derivatives, SFTs, and exempted exposures), of which:	4,552,820
EU-2	Trading book exposures	
EU-3	Banking book exposures, of which:	4,552,820
EU-4	Covered bonds	
EU-5	Exposures treated as sovereigns	1,048,134
EU-6	Exposures to regional governments, MDB, international organisations and PSE, not treated as sovereigns	
EU-7	Institutions	36,675
EU-8	Secured by mortgages of immovable properties	2,170,260
EU-9	Retail exposures	728,095
EU-10	Corporates	310,340
EU-11	Exposures in default	58,209
EU-12	Other exposures (eg equity, securitisations, and other non-credit obligation assets)	201,107

Table EU LRA: Disclosure of LR qualitative information

In 2024 there were no significant factors that influenced the leverage ratio.

DISCLOSURE OF LIQUIDITY REQUIREMENTS

Table EU LIQA - Liquidity risk management

One of the Bank Group's priority objectives is to maintain acceptable liquidity adequacy. Liquidity adequacy ensures that the Group meets its payment obligations at all times, under both normal and stressed conditions. The main strategy for managing liquidity risk is to maintain a conservative liquidity risk profile and an adequate liquidity buffer. The financing strategy is to ensure sufficient and stable funding for core activities through external financing.

ILAAP is an integral part of the overall governance system, ensuring sound processes and systems for identifying, assessing, managing and monitoring liquidity risk over appropriate time periods, including intraday, thereby ensuring that the Group has an adequate liquidity buffer. ILAAP is integrated into the Group's risk management system. Liquidity risk management is divided into long-term (over one year), short-term (up to one year) and daily liquidity management. Liquidity risk is managed through three lines of defence. The first line of defence consists of the treasury and the business. The Risk Department acts as the second line of defence and is responsible for monitoring liquidity risk. The third line of defence includes Internal Audit, which is responsible for independent monitoring of the first and second lines of defence.

The Group is not dependent on market sources of funding. One of the Group's strengths is its stable retail deposit base, which forms the basis of the Group's funding. In addition, the Group has the potential to finance itself by

raising subordinated loans or issuing debt securities. Diversification of funding across investor types, products and instruments is important to ensure stable liquidity. The Bank Group aims to attract minimum requirement for own funds and eligible liabilities (MREL) eligible liabilities to achieve partial diversification of funding sources.

The Risk Department is responsible for ILAAP and the design and effective functioning of the liquidity risk management system at the Group level, and on the basis of the results of ILAAP and all other relevant information, the Risk Department annually provides an assessment of the Group's liquidity adequacy in the liquidity adequacy statement. The Supervisory Board approves the liquidity risk strategy and the liquidity risk appetite set out in the Risk Appetite Statement and the Risk Strategy. The Bank's Board is responsible for approving the overall ILAAP and the following components: the liquidity management system; the liquidity adequacy statement; the methodology used to assess liquidity adequacy (including the stress testing system and the clearly articulated definition of liquidity adequacy); the ILAAP report. The Risk Management Committee is responsible for developing methodologies for the quantification of liquidity risk, including the key assumptions and parameters (e.g., time horizon, confidence levels and maturity structure) for the calculation of the risk, based on reliable data and sound data systems. The Asset Liability Management Committee (ALMC) monitors the effectiveness of liquidity management and makes recommendations to the Bank's business units on its effectiveness.

The Bank is the main influencer and manager of the Group's liquidity profile and the subsidiaries do not have a significant impact on the Group's overall liquidity. The monitoring system in place ensures that when liquidity-relevant factors arise in subsidiaries, they are taken into account in liquidity management decisions.

Liquidity risk management is based on:

- monitoring and controlling liquidity risk using liquidity adequacy ratios;
- balancing cash inflows and outflows;
- ensuring compliance with liquidity risk limits;
- stress testing.

The Group actively manages liquidity risk by monitoring liquidity adequacy ratios at various points in time, including intraday, in order to identify and assess potential threats in a timely manner, to draw practical conclusions and to take preventive action to ensure that the Bank Group's internal liquidity buffer is sufficient. The Group uses a system of liquidity indicators and limits to assess liquidity risk. Indicators are defined in terms of target (green), warning (yellow) and danger (red) zones. The limits of the limit zones are set in accordance with the Bank's overall strategy, the liquidity risk appetite and actual trends, and the results of the testing, which allows for an effective limitation of risks and losses and the maintenance of a liquidity adequacy acceptable to the Group. A clearly regulated system for setting, monitoring and controlling limits and other restrictions ensures that liquidity risk is appropriately managed in line with the level of liquidity risk borne by the Group and taking into account current and expected future activities.

CRO is responsible for the timely reporting of ILAAP results to supervisory authorities in accordance with the regulator's procedures.

In line with the strategic plan, the Bank Group will continue to maintain a conservative liquidity risk profile and a sufficient liquidity buffer consisting of high-quality assets. In line with its strategic direction, the Group sees diversification of funding sources and avoidance of concentration as the main focus of liquidity management.

Liquidity risk management includes contingency liquidity measures (i.e., a liquidity plan) that can be taken, including the amount of contingency liquidity that could be collected in the event of adverse conditions; the time frame over which the measures would be implemented; the potential negative impact (on the profit and loss account, reputation, etc.); and the likelihood of the measures being fully implemented in the event of adverse conditions. The mechanism for resolving liquidity problems in the event of stress is regulated by the Business Continuity Plan in the Event of a Liquidity Crisis (Liquidity Plan) of Šiaulių Bankas, which is an integral part of the Bank's Business Continuity Plan. The Liquidity Plan defines the liquidity ratios and details the conditions for possible activation of the plan. The

monitoring and analysis of these ratios and the constant provision of information to the Risk Management Committee allow the identification of a potential adverse liquidity event before it becomes a liquidity crisis.

Regular stress testing must ensure the adequacy of liquidity in the event of adverse circumstances. Liquidity testing provides insight into the impact of adverse events on liquidity adequacy, the quantitative and qualitative adequacy of available liquid assets, and the adequacy of liquidity buffers to cover the risks that may arise under various types of stress scenarios.

Liquidity risk testing assesses:

- Financing risk – the actual or foreseeable risk arising from the inability of the Group to meet its obligations to depositors without incurring unacceptable losses;
- Market risk – the risk that the Group will not be able to easily offset or sell an existing position without affecting the market price and will incur significant losses due to market imbalances.

Liquidity risk may be assessed under the following three scenarios: a Bank Group-exclusive scenario, a market-wide scenario, and a combination of the two, and may be subject to reverse testing with a significant negative result. The extent and frequency of stress testing depends on the Group's current level of liquidity risk and the economic environment.

Template EU LIQ1 - Quantitative information of LCR

Scope of consolidation (consolidated)

		Total unweighted value (average)			
EU 1a	Quarter ending on (31 December 2024)	31-12-2024	30-09-2024	30-06-2024	31-03-2024
EU 1b	Number of data points used in the calculation of averages	12	12	12	12
HIGH-QUALITY LIQUID ASSETS					
1	Total high-quality liquid assets (HQLA)				
CASH – OUTFLOWS					
2	Retail deposits and deposits from small business customers, of which:	2,644,498	2,579,140	2,516,166	2,446,024
3	<i>Stable deposits</i>	1,138,156	1,103,159	1,079,106	1,069,257
4	<i>Less stable deposits</i>	729,770	725,462	723,352	720,662
5	Unsecured wholesale funding	563,207	554,696	540,595	534,219
6	<i>Operational deposits (all counterparties) and deposits in networks of cooperative banks</i>				
7	<i>Non-operational deposits (all counterparties)</i>	563,207	554,696	540,595	534,219
8	<i>Unsecured debt</i>				
9	Secured wholesale funding				
10	Additional requirements	368,654	369,589	357,052	366,428
11	<i>Outflows related to derivative exposures and other collateral requirements</i>	2,909	2,942	2,576	2,805
12	<i>Outflows related to loss of funding on debt products</i>				
13	<i>Credit and liquidity facilities</i>	365,745	366,647	354,476	363,623
14	Other contractual funding obligations	41,043	43,591	25,280	24,776
15	Other contingent funding obligations	130,391	150,463	166,936	174,439
16	TOTAL CASH OUTFLOWS				
CASH – INFLOWS					
17	Secured lending (e.g. reverse repos)	2,738	2,339	2,170	1,943
18	Inflows from fully performing exposures	94,925	96,420	98,530	96,571
19	Other cash inflows	11,139	11,555	51,184	108,316

(All amounts are in EUR thousand, unless otherwise stated)

ES-19a	(Difference between total weighted inflows and total weighted outflows arising from transactions in third countries where there are transfer restrictions or which are denominated in non-convertible currencies)				
ES-19b	(Excess inflows from a related specialised credit institution)				
20	TOTAL CASH INFLOWS	108,802	110,314	151,885	206,830
ES-20a	Fully exempt inflows	-	-	-	-
ES-20b	Inflows subject to 90% cap	-	-	-	-
ES-20c	Inflows subject to 75% cap	108,802	110,314	151,885	206,830
TOTAL ADJUSTED VALUE					
21	LIQUIDITY BUFFER				
22	TOTAL NET CASH OUTFLOWS				
23	LIQUIDITY COVERAGE RATIO (%)				

(continued)

		Total weighted value (average)			
EU 1a	Quarter ending on (31 December 2024)	31-12-2024	30-09-2024	30-06-2024	31-03-2024
EU 1b	Number of data points used in the calculation of averages	12	12	12	12
HIGH-QUALITY LIQUID ASSETS					
1	Total high-quality liquid assets (HQLA)	964,617	929,794	833,436	707,818
CASH – OUTFLOWS					
2	Retail deposits and deposits from small business customers, of which:	232,529	225,062	214,548	195,913
3	<i>Stable deposits</i>	56,908	55,158	53,955	53,463
4	<i>Less stable deposits</i>	92,713	92,603	92,792	92,687
5	Unsecured wholesale funding	238,379	236,773	231,830	229,851
6	<i>Operational deposits (all counterparties) and deposits in networks of cooperative banks</i>				
7	<i>Non-operational deposits (all counterparties)</i>	238,379	236,773	231,830	229,851
8	<i>Unsecured debt</i>				
9	Secured wholesale funding				
10	Additional requirements	35,642	35,622	34,021	35,622
11	<i>Outflows related to derivative exposures and other collateral requirements</i>	2,909	2,942	2,576	2,805
12	<i>Outflows related to loss of funding on debt products</i>				
13	<i>Credit and liquidity facilities</i>	32,733	32,680	31,445	32,817
14	Other contractual funding obligations	41,043	43,591	25,280	24,776
15	Other contingent funding obligations	6,520	7,523	8,347	8,722
16	TOTAL CASH OUTFLOWS	554,112	548,570	514,026	494,885
CASH – INFLOWS					
17	Secured lending (e.g. reverse repos)	2,738	2,339	2,170	1,913
18	Inflows from fully performing exposures	57,700	59,842	62,636	61,018
19	Other cash inflows	11,139	11,555	51,184	108,316
ES-19a	(Difference between total weighted inflows and total weighted outflows arising from transactions in third countries where there are transfer restrictions or which are denominated in non-convertible currencies)				
ES-19b	(Excess inflows from a related specialised credit institution)				
20	TOTAL CASH INFLOWS	71,577	73,735	115,991	171,247
ES-20a	Fully exempt inflows	-	-	-	-
ES-20b	Inflows subject to 90% cap	-	-	-	-
ES-20c	Inflows subject to 75% cap	71,577	73,735	115,991	171,247
TOTAL ADJUSTED VALUE					

(All amounts are in EUR thousand, unless otherwise stated)

21	LIQUIDITY BUFFER	964,617	929,794	833,436	707,818
22	TOTAL NET CASH OUTFLOWS	482,535	474,835	398,035	323,638
23	LIQUIDITY COVERAGE RATIO (%)	202.24%	198.25%	217.87%	228.81%

Table EU LIQB on qualitative information on LCR, which complements template EU LIQ1

The main factors influencing the Group's LCR are changes in the liquidity buffer, which is largely made up of highly liquid government securities and funds held with the central bank, and cash outflows, primarily related to unsecured wholesale funding.

The Financial Group uses Retail deposits as the main source of financing. More detailed information on the concentration of funding sources in notes 20 to 23 to the Financial Statements for the year ended 31 December 2024.

Liquidity buffer is formed of high-quality assets that can easily be converted into cash without any restrictions and with minimal losses. Due to that fact the Financial Group possesses a significant debt securities portfolio, which is highly liquid.

The Group has insignificant derivative positions consisting of forward foreign exchange contracts and derivatives linked to the prices of financial instruments. Their share of total assets is 0.41%.

The Financial Group's 100% of assets are accounted for in euro and 98 % of liabilities. Therefore it not gives rise to an inherent risk of currency mismatch in the LCR.

Template EU LIQ2: Net Stable Funding Ratio

Scope of consolidation consolidated Quarter ending on 31 December 2024		Unweighted value by residual maturity				Weighted value
		No maturity	< 6 months	6 months to <	≥ 1yr	
Available stable funding (ASF) Items						
1	Capital items and instruments	562,050				660,034
2	Own funds	562,050			97,984	660,034
3	Other capital instruments					
4	Retail deposits		2,362,038	359,096	158,699	2,699,217
5	Stable deposits		1,555,303	274,650	117,844	1,856,299
6	Less stable deposits		806,735	84,446	40,855	842,918
7	Wholesale funding:		616,344	50,378	51,425	360,432
8	Operational deposits					
9	Other wholesale funding		616,344	50,378	51,425	360,432
10	Interdependent liabilities					
11	Other liabilities:	123	58,975	8,411	420,422	424,628
12	NSFR derivative liabilities	123				
13	All other liabilities and capital instruments not included in the above categories		58,975	8,411	420,422	424,628
14	Total available stable funding (ASF)					4,144,310
Required stable funding (RSF) Items						
15	Total high-quality liquid assets (HQLA)					9,166
EU-15a	Assets encumbered for a residual maturity of one year or more in a cover pool					
16	Deposits held at other financial institutions for operational purposes					

(All amounts are in EUR thousand, unless otherwise stated)

17	Performing loans and securities:		232,350	163,991	3137,021	2687,496
18	<i>Performing securities financing transactions with financial customers collateralised by Level 1 HQLA subject to 0% haircut</i>					
19	<i>Performing securities financing transactions with financial customer collateralised by other assets and loans and advances to financial institutions</i>		36,057	503	675	3,518
20	<i>Performing loans to non- financial corporate clients, loans to retail and small business customers, and loans to sovereigns, and PSEs, of which:</i>		185,550	153,096	2,149,126	1,996,080
21	<i>With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk</i>					
22	<i>Performing residential mortgages, of which:</i>		112	77	916,684	612,562
23	<i>With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk</i>		31	50	833,570	541,861
24	<i>Other loans and securities that are not in default and do not qualify as HQLA, including exchange-traded equities and trade finance on-balance sheet products</i>		10,631	10,315	70,536	75,336
25	Interdependent assets					
26	Other assets:		10,655	1,028	67,459	73,355
27	<i>Physical traded commodities</i>					
28	<i>Assets posted as initial margin for derivative contracts and contributions to default funds of CCPs</i>					
29	<i>NSFR derivative assets</i>					
30	<i>NSFR derivative liabilities before deduction of variation margin posted</i>				1,093	55
31	<i>All other assets not included in the above categories</i>		10,655	1,028	67,459	73,301
32	Off-balance sheet items		49,251	66,776	152,604	13,541
33	Total RSF					2,783,559
34	Net Stable Funding Ratio (%)					148.89%

Scope of consolidation consolidated
Quarter ending on 30 September 2024

		Unweighted value by residual maturity				Weighted value
		No maturity	< 6 months	6 months to < 1yr	≥ 1yr	
Available stable funding (ASF) Items						
1	Capital items and instruments	476,134				571,134
2	<i>Own funds</i>	476,134			95,000	571,134
3	<i>Other capital instruments</i>					
4	Retail deposits		2,079,081	444,360	161,591	2,520,076
5	<i>Stable deposits</i>		1,423,371	324,382	130,345	1,790,710
6	<i>Less stable deposits</i>		655,710	119,978	31,246	729,365
7	Wholesale funding:		678,734	38,900	53,642	384,612
8	<i>Operational deposits</i>					
9	<i>Other wholesale funding</i>		678,734	38,900	53,642	384,612
10	Interdependent liabilities					
11	Other liabilities:	966	279,880	11,773	427,471	433,358
12	<i>NSFR derivative liabilities</i>	966				

(All amounts are in EUR thousand, unless otherwise stated)

13	<i>All other liabilities and capital instruments not included in the above categories</i>		279,880	11,773	427,471	433,358
14	Total available stable funding (ASF)					3,909,179
Required stable funding (RSF) Items						
15	Total high-quality liquid assets (HQLA)					10,676
EU-15a	Assets encumbered for a residual maturity of one year or more in a cover pool					
16	Deposits held at other financial institutions for operational purposes					
17	Performing loans and securities:		261,191	148,245	3130,020	2,659,440
18	<i>Performing securities financing transactions with financial customers collateralised by Level 1 HQLA subject to 0% haircut</i>					
19	<i>Performing securities financing transactions with financial customer collateralised by other assets and loans and advances to financial institutions</i>		41,032	1,124	1,024	4,598
20	<i>Performing loans to non-financial corporate clients, loans to retail and small business customers, and loans to sovereigns, and PSEs, of which:</i>		198,211	140,325	2,148,334	1,995,352
21	<i>With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk</i>					
22	<i>Performing residential mortgages, of which:</i>		90	117	907,642	607,917
23	<i>With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk</i>		9	102	818,411	532,023
24	<i>Other loans and securities that are not in default and do not qualify as HQLA, including exchange-traded equities and trade finance on-balance sheet products</i>		21,858	6,679	73,020	51,573
25	Interdependent assets					
26	Other assets:		18,034	591	67,594	76,918
27	<i>Physical traded commodities</i>					
28	<i>Assets posted as initial margin for derivative contracts and contributions to default funds of CCPs</i>					
29	<i>NSFR derivative assets</i>					
30	<i>NSFR derivative liabilities before deduction of variation margin posted</i>				223	11
31	<i>All other assets not included in the above categories</i>		18,034	591	67,594	76,907
32	Off-balance sheet items		109,280	77,595	241,259	21,543
33	Total RSF					2,768,577
34	Net Stable Funding Ratio (%)					141.20%

Scope of consolidation consolidated
Quarter ending on 30 June 2024

		Unweighted value by residual maturity				Weighted value
		No maturity	< 6 months	6 months to < 1yr	≥ 1yr	
Available stable funding (ASF) Items						
1	Capital items and instruments	459,166				525,112
2	<i>Own funds</i>	459,166			65,946	525,112
3	<i>Other capital instruments</i>					
4	Retail deposits		2,006,580	444,162	173,385	2,463,416
5	<i>Stable deposits</i>		1,363,303	323,954	141,920	1,744,814
6	<i>Less stable deposits</i>		643,277	120,208	31,465	718,602
7	Wholesale funding:		1,179,609	55,076	20,043	363,532

(All amounts are in EUR thousand, unless otherwise stated)

8	Operational deposits					
9	Other wholesale funding		1,179,609	55,076	20,043	363,532
10	Interdependent liabilities					
11	Other liabilities:	213	280,936	10,240	149,484	154,604
12	NSFR derivative liabilities	213				
13	All other liabilities and capital instruments not included in the above categories		280,936	10,240	149,484	154,604
14	Total available stable funding (ASF)					3,506,663
Required stable funding (RSF) Items						
15	Total high-quality liquid assets (HQLA)					15,458
EU-15a	Assets encumbered for a residual maturity of one year or more in a cover pool					
16	Deposits held at other financial institutions for operational purposes					
17	Performing loans and securities:		195,963	198,837	2,906,826	2,485,896
18	Performing securities financing transactions with financial customers collateralised by Level 1 HQLA subject to 0% haircut					
19	Performing securities financing transactions with financial customer collateralised by other assets and loans and advances to financial institutions		18,706	18,745	1,834	12,946
20	Performing loans to non-financial corporate clients, loans to retail and small business customers, and loans to sovereigns, and PSEs, of which:		160,862	169,646	1,975,015	1,844,017
21	With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk					
22	Performing residential mortgages, of which:		91	197	849,916	571,109
23	With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk		10	60	757,316	492,290
24	Other loans and securities that are not in default and do not qualify as HQLA, including exchange-traded equities and trade finance on-balance sheet products		16,304	10,249	80,061	57,824
25	Interdependent assets					
26	Other assets:		14,527	346	72,447	79,926
27	Physical traded commodities					
28	Assets posted as initial margin for derivative contracts and contributions to default funds of CCPs					
29	NSFR derivative assets					
30	NSFR derivative liabilities before deduction of variation margin posted				856	43
31	All other assets not included in the above categories		14,527	346	72,447	79,884
32	Off-balance sheet items		76,584	75,982	206,964	18,098
33	Total RSF					2,599,378
34	Net Stable Funding Ratio (%)					134.90%

Scope of consolidation consolidated
Quarter ending on 31 March 2024

		Unweighted value by residual maturity				Weighted value
		No maturity	< 6 months	6 months to < 1yr	≥ 1yr	
Available stable funding (ASF) Items						
1	Capital items and instruments	465,393				528,276
2	Own funds	465,393			62,883	528,276

(All amounts are in EUR thousand, unless otherwise stated)

3	Other capital instruments					
4	Retail deposits		2,034,128	326,938	167,598	2,373,046
5	Stable deposits		1,363,149	246,625	140,258	1,669,543
6	Less stable deposits		670,979	80,313	27,340	703,503
7	Wholesale funding:		1,116,021	89,488	31,803	365,811
8	Operational deposits					
9	Other wholesale funding		1,116,021	89,488	31,803	365,811
10	Interdependent liabilities					
11	Other liabilities:	167	123,631	214,774	103,588	210,975
12	NSFR derivative liabilities	167				
13	All other liabilities and capital instruments not included in the above categories		123,631	214,774	103,588	210,975
14	Total available stable funding (ASF)					3,478,108
Required stable funding (RSF) Items						
15	Total high-quality liquid assets (HQLA)					20,065
EU-15a	Assets encumbered for a residual maturity of one year or more in a cover pool					
16	Deposits held at other financial institutions for operational purposes					
17	Performing loans and securities:		402,915	190,794	2,460,319	2,176,480
18	Performing securities financing transactions with financial customers collateralised by Level 1 HQLA subject to 0% haircut					
19	Performing securities financing transactions with financial customer collateralised by other assets and loans and advances to financial institutions		186,191	197,145	2,783,746	2,381,947
20	Performing loans to non-financial corporate clients, loans to retail and small business customers, and loans to sovereigns, and PSEs, of which:					
21	With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk		20,726	18,493	1,290	12,609
22	Performing residential mortgages, of which:		152,805	160,822	1,897,547	1,769,728
23	With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk					
24	Other loans and securities that are not in default and do not qualify as HQLA, including exchange-traded equities and trade finance on-balance sheet products		101	157	803,825	540,184
25	Interdependent assets		20	24	715,983	465,411
26	Other assets:		12,559	17,673	81,084	59,426
27	Physical traded commodities					
28	Assets posted as initial margin for derivative contracts and contributions to default funds of CCPs					
29	NSFR derivative assets					
30	NSFR derivative liabilities before deduction of variation margin posted				660	33
31	All other assets not included in the above categories		8,060	779	78,886	83,306
32	Off-balance sheet items		63,339	88,497	203,227	17,872
33	Total RSF					2,503,222
34	Net Stable Funding Ratio (%)					138.95%

CREDIT RISK AND CREDIT QUALITY

Table EU CRA: General qualitative information about credit risk

For general qualitative information on credit risk, see Note 1 “Financial Risk Management” in the Explanatory Notes to the Financial Statements, section 1 “Credit Risk” (page 24).

Credit risk is defined as the risk for the Group to incur losses due to the Group’s customers’ failure to fulfil their financial obligations towards the Group. Credit exposures arise principally in lending activities and it is the most significant risk in the Group’s banking activities.

There is also credit risk in investment activities that arise from debt securities and in the Group’s asset portfolio as well as in the off-balance sheet financial instruments, such as loan commitments, guarantees and letters of credit.

The Bank regularly reviews its credit risk management policies which include lending policies, credit risk limit control, other credit risk mitigation measures as well as the internal control and internal audit of credit risk management.

The Bank’s Board has approved the credit risk management policies and procedures which lay down the principles for credit risk management and control, establish an acceptable level of credit risk and credit risk’s structure and determine credit risk mitigation measures and their interaction. This ensures a uniform understanding of the principles for taking on exposure to credit risk and allows achieving consistency with the nature and complexity of the Bank’s lending policy and the prudential requirements.

Risk appetite and risk tolerance are set by Bank Risk Appetite Statements and related documents defining the minimum level of the risk expressed in key ratios and qualitative statements the organization could accept to maintain risk profile associated with business strategy. The Risk Appetite Statement is approved by the Supervisory Council of the Bank and cascaded further through the risk management procedures.

The Bank takes risks only in the fields, which are well known to it and where it has long-term experience, trying to avoid excessive risk in transactions that can have negative influence to the big portion of shareholders’ equity but seeks the sufficient profitability which, in terms of increasing competition, would ensure the stable Bank’s position in the market and would increase the Bank’s value. In assessing exposure to credit risk, the Bank adheres to the principle of prudence.

The Bank’s lending policy is focused on small and medium-size business clients, seeking to provide them with the better funding terms and long-term support, at the same time paying attention to Bank’s potential to grow.

Large entities are defined as entities employing more than 250 employees. Small and medium size entities are defined as entities employing less than 250 employees and the balance sheet total does not exceed EUR 43 million or annual turnover does not exceed EUR 50 million.

New types of activities or products are launched only after the assessment of the arising risk. All lending products and processes at the Bank are regulated and documented pursuant to the requirements of risk assessment and internal control policy. Special procedures are established with respect to each lending product.

The aim of the Bank’s credit risk management policy is to ensure that the conflict between interests of staff or structural units is avoided. With respect to provision of credits to clients, the principle stating that profit should not be earned at the expense of excessive credit risk is observed.

The Bank's credit risk management policy is based on regulatory requirements to adequate risk management policy and the best practice in risk management of other banks. Therefore, the Bank's employees continuously enhance their knowledge of credit risk management systems of Lithuanian and foreign banks and the results of their application.

The Bank applies credit risk management measures, which could be divided into two types:

- Measures that help to avoid decisions to grant loans with higher risk potential;
- Measures ensuring the effective monitoring system of the Bank's asset quality.

Measures that help to avoid decisions to grant loans with higher risk potential:

- Multi-stage decision-making and its approval system;
- Defined credit risk appetite, credit risk indicators and risk allocation among structural levels – limit establishment;
- Customer risk assessment requirements set by internal procedures;
- Credit standards and acceptable credit risk criteria for separate products;
- Security measures for credit repayment (collateral).

Multi-stage decision-making and its approval system has an aim not to make one-man decisions regarding credit granting by authorized persons but to make them be discussed by the collegial bodies of the Bank and, as the case may be, by the Bank's Loan Committee, the Bank's Board or Council. There are certain limits to authorized persons established regarding credit granting implementation as well as approval limits to collegial bodies. Limit establishment depends on the authorized persons' qualification, experience and the effectiveness of their managed branches; while in the Branch Committees and the Bank Loan Committee the attention is paid to the Committee members' qualification, experience and economic activity of the region, where the branch is located, the quality of loan portfolio and other factors. The level of involvement of second line of defence in decision making process, providing secondary opinion or/ and performing decision-making control is determined depending on the size of the loan and compliance with the crediting standards.

It is very important to precisely analyse all the information about the customer before granting the credit. The goal of credit analysis is to do the best in evaluating the customer's creditworthiness, status and prospects in the field where he/she provides his/her goods or services. Every credit decision is based on the adequate assessment of credit repayment possibilities proportionate to the size of exposure and level of possible risk. Providing credit first of all the Bank analyses the borrower's financial capacity from the borrower's cash flows. The repayment of credits granted by the Bank must be enough secure in order to minimize possible credit repayment risks. A security measure has to be chosen in accordance with the credit type. Providing credit first of all the Bank analyses the borrower's financial capacity and credit repayment possibilities from the borrower's cash flows.

Credit administration and constant credit monitoring is the main principle in the Bank's security and reliability maintenance. The proper credit administration includes the timely updating of the borrower's credit file, providing with the latest financial information, the timely introduction of latest financial information to the database and preparation of the various documents and their amendments.

The Bank's Credit Risk Department collects and, if necessary, provides to responsible managerial personnel information on external conditions, the growth of the credit portfolio and fulfilment of targeted profit, expenses associated with risks, the largest amounts due from clients, distribution of credits by the type of economic activity, repayment terms past due, the largest clients with default possibilities, analysis of the credit portfolio by risk groups, changes in risk groups over a certain time period and other credit risk metrics.

The Bank establishes and implements the procedures, improves information systems for monitoring separate credits as well as loan portfolio. These procedures include the criteria for early indication of potentially impaired loans and other transactions.

The credit risk management and control function is the part of independent risk management function in the second line of defence. It is independent from credit granting function. The credit risk control responsibilities lay within risk management division and insures independent control of credit risk management practices and processes.

Debt securities

Credit risk exposures with respect to debt securities are managed by carrying out counterparty analysis when decision for acquisition of securities is made. The concentration risk together with lending exposure arising from debt securities portfolio is analysed and monitored on a regular basis by the Risk Management Committee of the Bank.

Credit-related commitments

Other credit-related commitments assumed by the Group include guarantees, letters of documentary credit, commitments to grant a credit which expose the Group to the same credit risk as the loans do. The key aim of these instruments is to ensure that funds are available to a customer as required. The above guarantees and letters of documentary credit are usually collateralised by clients' funds in the Bank accounts. With regards to commitments to grant credit the Bank is exposed to loss equal to the unused commitment amount.

Table EU CRB: Additional disclosure related to the credit quality of assets

For accounting and regulatory purposes, the recording of delinquency based on deviation from the contractual payment schedule, the identification of impaired positions and the methods for determining general and specific credit risk adjustments are described in the Explanatory Notes to the 2024 Financial Statements, see Note "Accounting Principles", section "Impairment of Financial Assets" (page 17), and Note "Financial Risk Management", section 1.3 "Impairment and provisioning policies" (page 27). The definition of default is in line with the EBA Guidelines on the definition of credit defaults.

Template EU CR1: Performing and non-performing exposures and related provisions

	a	b	c	d	e	f	g	h	
Gross carrying amount/nominal amount									
	Performing exposures				Non-performing exposures				
		Of which stage 1	Of which stage 2	of which: purchased or originated credit-impaired financial assets		Of which stage 2	Of which stage 3	of which: purchased or originated credit-impaired financial assets	
005	Cash balances at central banks and other demand deposits	308,147	308,147						
010	Loans and advances	3,424,051	3,198,288	224,465	1,298	78,457	1	78,336	120
020	Central banks								
030	General governments	47,280	46,514	766		33		33	

(All amounts are in EUR thousand, unless otherwise stated)

040	Credit institutions	4,462	4,462						
050	Other financial corporations	154,197	139,563	14,634		3		3	
060	Non-financial corporations	1,810,946	1,664,582	145,128	1,236	47,512	1	47,404	107
070	Of which SMEs	1,500,208	1,358,533	140,439	1,236	29,043		29,043	-
080	Households	1,407,166	1,343,167	63,937	62	30,909		30,896	13
090	Debt securities	757,931	756,967	964					
100	Central banks								
110	General governments	714,414	714,414						
120	Credit institutions	2,436	2,436						
130	Other financial corporations	11,918	10,954	964					
140	Non-financial corporations	29,163	29,163						
150	Off-balance-sheet exposures	479,302	459,732	19,570		2,307		2,307	
160	Central banks								
170	General governments	1,378	1,378						
180	Credit institutions	2,020	2,020						
190	Other financial corporations	48,793	44,931	3,862					
200	Non-financial corporations	379,002	364,523	14,479		2,291		2,291	
210	Households	48,109	46,880	1,229		16		16	
220	Total	4,969,431	4,723,134	244,999	1,298	80,764	1	80,643	120

(continued)

	i	j	k	l	m	n	o	p	q	r		s								
										Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions								Collateral and financial guarantees received		
										Performing exposures – accumulated impairment and provisions			Non-performing exposures – accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions			Accumulated partial write-off	On performing exposures	On non-performing exposures		
Of which stage 1	Of which stage 2	of which: purchased or originated credit-impaired financial assets	Of which stage 2	Of which stage 3	of which: purchased or originated credit-impaired financial assets															
005	Cash balances at central banks and other demand deposits	(4)	(4)																	
010	Loans and advances	(37,239)	(31,192)	(6,039)	(8)	(20,148)		(20,044)	(104)	(427)	2,613,527	49,185								
020	Central banks																			
030	General governments	(70)	(69)	(1)		(6)		(6)			8,815	24								
040	Credit institutions																			
050	Other financial corporations	(1,489)	(1,453)	(36)		(3)		(3)			80,102									
060	Non-financial corporations	(20,664)	(19,341)	(1,315)	(8)	(10,867)		(10,770)	(97)	(427)	1,556,008	36,037								
070	Of which SMEs	(18,586)	(17,288)	(1,290)	(8)	(7,603)		(7,603)			1,290,925	21,007								

(All amounts are in EUR thousand, unless otherwise stated)

080	Households	(15,016)	(10,329)	(4,687)		(9,272)		(9,265)	(7)		968,602	13,124
090	Debt securities	(73)	(38)	(35)								
100	Central banks											
110	General governments	(4)	(4)									
120	Credit institutions	(2)	(2)									
130	Other financial corporations	(43)	(8)	(35)								
140	Non-financial corporations	(24)	(24)									
150	Off-balance-sheet exposures	74	74									
160	Central banks											
170	General governments											
180	Credit institutions											
190	Other financial corporations											
200	Non-financial corporations	74	74									
210	Households											
220	Total	(37,242)	(31,160)	(6,074)	(8)	(20,148)	-	(20,044)	(104)	(427)	2,613,527	49,185

Template EU CR1-A: Maturity of exposures

		a	b	c	d	e	f
		Net exposure value					
		On demand	<= 1 year	> 1 year <= 5 years	> 5 years	No stated maturity	No stated maturity
1	Loans and advances		598,108	1,740,031	1,398,442	16,683	3,753,264
2	Debt securities		179,597	574,964	3,297		757,858
3	Total		777,705	2,314,995	1,401,739	16,683	4,511,122

Template EU CR2: Changes in the stock of non-performing loans and advances

		a
		Gross carrying amount
010	Initial stock of non-performing loans and advances	85,355
020	Inflows to non-performing portfolios	30,096
030	Outflows from non-performing portfolios	(36,994)
040	Outflows due to write-offs	(1,229)
050	Outflow due to other situations	(35,765)
060	Final stock of non-performing loans and advances	78,457

Template EU CR2a: Changes in the stock of non-performing loans and advances and related net accumulated recoveries

		a	b
		Gross carrying amount	Related net accumulated recoveries
010	Initial stock of non-performing loans and advances	85,355	
020	Inflows to non-performing portfolios	30,096	
030	Outflows from non-performing portfolios	(36,994)	
040	Outflow to performing portfolio	(13,100)	

(All amounts are in EUR thousand, unless otherwise stated)

050	Outflow due to loan repayment, partial or total	(16,261)	
060	Outflow due to collateral liquidations	(2,446)	2,446
070	Outflow due to taking possession of collateral	(25)	25
080	Outflow due to sale of instruments	(2,963)	2,963
090	Outflow due to risk transfers		
100	Outflows due to write-offs	(1,229)	
110	Outflow due to other situations	(970)	
120	Outflow due to reclassification as held for sale		
130	Final stock of non-performing loans and advances	78,457	

Template EU CQ1: Credit quality of forborne exposures

		a	b	c	d	e		f	g	h
		Gross carrying amount/nominal amount of exposures with forbearance measures				Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions		Collateral received and financial guarantees received on forborne exposures		
		Performing forborne	Non-performing forborne			On performing forborne exposures	On performing forborne exposures	Of which collateral and financial guarantees received on non-performing exposures with forbearance measures		
	Of which defaulted		Of which impaired							
005	Cash balances at central banks and other demand deposits	33,992	38,650	38,650	38,650	(304)	(9,236)	58,201	27,035	
010	Loans and advances									
020	<i>Central banks</i>									
030	<i>General governments</i>									
040	<i>Credit institutions</i>									
050	<i>Other financial corporations</i>	30,931	32,885	32,885	32,885	(255)	(6,931)	55,807	25,584	
060	<i>Non-financial corporations</i>	3,061	5,765	5,765	5,765	(49)	(2,305)	2,394	1,451	
070	<i>Households</i>									
080	Debt Securities	1,651	1,610							
090	Loan commitments given	35,643	40,260	38,650	38,650	(304)	(9,236)	58,201	27,035	
100	Total	33,992	38,650	38,650	38,650	(304)	(9,236)	58,201	27,035	

Template EU CQ2: Quality of forbearance

	a
	Gross carrying amount of forborne exposures
Loans and advances that have been forborne more than twice	652
Non-performing forborne loans and advances that failed to meet the non-performing exit criteria	32,046

Template EU CQ3: Credit quality of performing and non-performing exposures by past due days

	a	b	c	d	e	f	g
Gross carrying amount/nominal amount							
	Performing exposures			Non-performing exposures			
		Not past due or past due ≤ 30 days	Past due > 30 days ≤ 90 days		Unlikely to pay that are not past due or are past due ≤ 90 days	Past due > 90 days ≤ 180 days	Past due > 180 days ≤ 1 year
005	Cash balances at central banks and other demand deposits	308,147	308,147				
010	Loans and advances	3,417,914	3,397,353	20,561	78,457	33,529	8,067
020	Central banks						
030	General governments	47,280	47,106	174	33		15
040	Credit institutions	4,462	4,462				
050	Other financial corporations	148,060	148,060		3	3	
060	Non-financial corporations	1,810,946	1,802,936	8,010	47,512	15,129	2,154
070	Of which SMEs	1,500,208	1,494,381	5,827	29,043	14,165	1,480
080	Households	1,407,166	1,394,789	12,377	30,909	18,397	5,913
090	Debt securities	757,931	757,931				
100	Central banks						
110	General governments	714,414	714,414				
120	Credit institutions	2,436	2,436				
130	Other financial corporations	11,918	11,918				
140	Non-financial corporations	29,163	29,63				
150	Off-balance-sheet exposures	479,302			2,307		
160	Central banks						
170	General governments	1,378					
180	Credit institutions	2,020					
190	Other financial corporations	48,793					
200	Non-financial corporations	379,002			2,291		
210	Households	48,109			16		
220	Total	4,655,147	4,155,284	20,561	80,764	33,529	8,067

(continued)

	h	i	j	k	l
	Past due > 1 year ≤ 2 years	Past due > 2 years ≤ 5 years	Past due > 5 years ≤ 7 years	Past due > 7 years	Of which defaulted
005	Cash balances at central banks and other demand deposits				
010	Loans and advances	10,580	4,570	271	1,190
020	Central banks				
030	General governments	18			33
040	Credit institutions				
050	Other financial corporations				3

(All amounts are in EUR thousand, unless otherwise stated)

060	Non-financial corporations	9,064	2,700	109	817	47,511
070	Of which SMEs	8,378	2,483	51		29,043
080	Households	1,498	1,870	162	373	30,909
090	Debt securities					
100	Central banks					
110	General governments					
120	Credit institutions					
130	Other financial corporations					
140	Non-financial corporations					
150	Off-balance-sheet exposures					2,307
160	Central banks					
170	General governments					
180	Credit institutions					
190	Other financial corporations					
200	Non-financial corporations					2,291
210	Households					64
220	Total	6,442	3,250	322	2,822	85,662

Template EU CQ4: Quality of non-performing exposures by geography

	a	b	c	d	e	f	g
	Gross carrying/nominal amount				Accumulated impairment	Provisions on off-balance-sheet commitments and financial guarantees given	Accumulated negative changes in fair value due to credit risk on non-performing exposures
	Of which non-performing		Of which subject to impairment				
		Of which defaulted					
010	On-balance-sheet exposures	4,260,439	78,457	78,456	4,252,193	(57,460)	
020	Lithuania	4,135,343	78,455	78,454	4,129,206	(57,432)	
030	Latvia	80,330			80,330	(7)	
040	Other countries	44,766	2	2	42,657	(21)	
050	Off-balance-sheet exposures	481,609	2,307	2,307			74
060	Lithuania	479,453	2,307	2,307			74
070	Other countries	2,156					
080	Total	4,742,048	80,764	80,763	4,252,193	(57 460)	74

Template EU CQ5: Credit quality of loans and advances to non-financial corporations by industry

	a	b	c	d	e	f
	Gross carrying amount				Accumulated impairment	Accumulated negative changes in fair value due to credit risk on non-performing exposures
	Of which non-performing		Of which loans and advances subject to impairment			
		Of which defaulted				
010	Agriculture, forestry and fishing	52,281	641	641	52,281	(251)
020	Mining and quarrying	9,406	3	3	9,406	(64)
030	Manufacturing	268,360	21,738	21,738	268,360	(5,035)

(All amounts are in EUR thousand, unless otherwise stated)

040	Electricity, gas, steam and air conditioning supply	114,949	5,441	5,441	114,949	(2,971)	
050	Water supply	28,777	1,127	1,127	28,777	(320)	
060	Construction	171,523	1,855	1,855	171,523	(5,413)	
070	Wholesale and retail trade	197,131	2,233	2,233	197,131	(1,416)	
080	Transport and storage	101,892	378	378	101,892	(923)	
090	Accommodation and food service activities	67,972	27	27	67,972	(152)	
100	Information and communication	8,306	66	66	8,306	(70)	
110	Financial and insurance activities	2,338	9	9	2,338	(19)	
120	Real estate activities	531,674	10,516	10,516	531,674	(7,501)	
130	Professional, scientific and technical activities	65,224	176	176	65,224	(1,734)	
140	Administrative and support service activities	161,850	1,913	1,913	161,850	(4,132)	
150	Public administration and defence, compulsory social security	1			1		
160	Education	2,411			2,411	(3)	
170	Human health services and social work activities	58,196	1,306	1,306	58,196	(535)	
180	Arts, entertainment and recreation	9,875	19	19	9,875	(80)	
190	Other services	6,292	64	63	6,292	(912)	
200	Total	1,858,458	47,512	47,511	1,858,458	(31,531)	

Template EU CQ6: Collateral valuation - loans and advances

		a	b	c	d	e	f	g	h	i	j	k	l
Loans and advances													
		Performing			Non-performing								
					Past due > 90 days								
					Of which past due > 30 days ≤ 90 days	Unlikely to pay that are not past due or are past due ≤ 90 days	Past due > 90 days	Of which past due > 90 days ≤ 180 days	Of which: past due > 180 days ≤ 1 year	Of which: past due > 1 years ≤ 2 years	Of which: past due > 2 years ≤ 5 years	Of which: past due > 5 years ≤ 7 years	Of which: past due > 7 years
010	Gross carrying amount	3,502,508	3,424,051	20,561	78,457	33,529	44,928	8,067	20,250	10,580	4,570	271	1,190
020	Of which secured	2,718,269	2,650,330	16,356	67,939	28,448	44,755	5,188	18,520	9,906	4,422	265	1,190
030	Of which secured with immovable property	2,423,575	2,369,247	7,237	54,328	23,902	30,427	2,792	16,345	7,653	2,886	75	676
040	Of which instruments with LTV higher than 60% and lower or equal to 80%	542,421	532,428		9,993	8,906	1,087						
050	Of which instruments with LTV higher than 80% and lower or equal to 100%	234,265	231,077		3,188	2,312	877						
060	Of which instruments with LTV higher than 100%	30,842	30,206		636	342	294						

(All amounts are in EUR thousand, unless otherwise stated)

070	Accumulated impairment for secured assets	(36,894)	(21,716)	(1,630)	(15,178)	(4,600)	(10,578)	(927)	(2,693)	(3,035)	(2,578)	(203)	(1,142)
080	Collateral												
090	Of which value capped at the value of exposure	2,527,855	2,485,227	9,364	42,628	20,240	22,388	2,562	13,962	5,092	664	60	48
100	Of which immovable property	2,142,610	2,102,907	6,605	39,703	18,380	21,323	2,048	13,728	4,972	538		37
110	Of which value above the cap	8,350,595	7,811,442	19,896	539,153	233,314	305,839						
120	Of which immovable property	4,029,909	3,803,127	10,763	226,782	101,996	124,786						
130	Financial guarantees received	134,857	128,300	4,746	6,557	1,690	4,867	1,222	1,319	1,570	753	2	1
140	Accumulated partial write-off												

Template EU CQ7: Collateral obtained by taking possession and execution processes

		a	b
		Collateral obtained by taking possession	
		Value at initial recognition	Accumulated negative changes
010	Accumulated negative changes		
020	Other than PP&E	224	
030	Residential immovable property		
040	Commercial Immovable property		
050	Movable property (auto, shipping, etc.)	224	
060	Equity and debt instruments		
070	Other collateral		
080	Total	224	

Template EU CQ8: Collateral obtained by taking possession and execution processes – vintage breakdown

		a	b	c	d	e	f	g	h	i	j	k	l
		Debit balance reduction		Total collateral obtained by taking possession									
		Gross carrying amount	Accumulated negative changes	Value at initial recognition	Accumulated negative changes	Value at initial recognition	Accumulated negative changes	Value at initial recognition	Accumulated negative changes	Value at initial recognition	Accumulated negative changes	Value at initial recognition	Accumulated negative changes
010	Collateral obtained by taking possession classified as PP&E												
020	Collateral obtained by taking possession other than that classified as PP&E	228		228		228							

(All amounts are in EUR thousand, unless otherwise stated)

030	Residential immovable property												
040	Commercial immovable property												
050	Movable property (auto, shipping, etc.)	228		228		228							
060	Equity and debt instruments												
070	Other collateral												
080	Total	228		228		228							

INFORMATION ON CREDIT RISK MITIGATION MEASURES

Table EU CRC – Qualitative disclosure requirements related to CRM techniques

OBS netting products are not provided by the Group.

All collaterals must be evaluated in line with prudential requirements and valuation standards. The regular review of the values of collateral is performed by the Bank, the regularity is dependent on the type of pledged assets in compliance with prudential requirements. The prudent attitude towards the management of collateral is expressed in internal procedures for proper collateral management and collateral insurance policy.

The Group mitigates credit risk by taking security for loans granted. The types of collateral considered by the Group as the most acceptable for loans and advances are the following:

- Real estate (mainly residential properties, commercial and industrial real estate);
- Business assets (equipment, inventory, transport vehicles);
- Property rights over financial instruments (debt securities, equities);
- Third party guarantees.

The guarantees issued by the state institutions are accepted by the Group as the main type of guarantee reducing capital requirements. No credit derivatives are used as credit protection.

Long-term financing and lending to corporate entities are generally secured; revolving facilities and consumer loans to private individuals are generally unsecured. In order to minimize the credit loss as the impairment indicators for the relevant individual loans and advances are noticed the Group seeks for additional collateral from the counterparty.

While calculating a decrease in value for the loan the repayment of which is secured by the collateral, a cash flow from the security measure is also taken into consideration when determining the LGD factor. If several loans are insured with the same security measure (collateral), such security measure (collateral) is allocated according to rank of the pledge.

Debt securities, treasury and other eligible bills are generally unsecured.

For finance lease receivables the lender remains the owner of the leased object. Therefore, in case of customer's default the lender is able to gain control on the risk mitigation measures and realize them in rather short period

Qualitative information on credit risk mitigation is provided in the Explanatory Notes to the 2024 Financial Statements under "Financial Risk Management", section 1.2 "Control of risk limits and risk mitigation policy" (page 26), and section 1.5 "Loans to Customers" paragraph (d) "Information about loan collateral" (page 37).

Template EU CR3 – CRM techniques overview: Disclosure of the use of credit risk mitigation techniques

		Unsecured carrying amount	Secured carrying amount			
				Of which secured by collateral	Of which secured by financial guarantees	Of which secured by credit derivatives
		a	b	c	d	e
1	Loans and advances	1,090,552	2,662,712	2,527,855	134,857	
2	Debt securities	757,858				
3	Total	1,848,410	2,662,712	2,527,855	134,857	
4	<i>Of which non-performing exposures</i>	9,124	49,185	49,185	6,557	
EU-5	<i>Of which defaulted</i>	9,124	49,185			

DISCLOSURE OF THE USE OF THE STANDARDISED APPROACH

Table EU CRD – Qualitative disclosure requirements related to standardised approach

For the assessment of exposures that have an external credit rating, the Group uses credit rating agencies that are registered or certified in accordance with Regulation (EC) No. 1060/2009 of the European Parliament and of the Council of 16 September 2009 on credit rating agencies. Such External Credit Assessment Institutions (ECAI) are used:

- Standards & Poor's
- Moody's Investors Service
- Fitch Ratings

Exposures of debt securities and institutions are subject to the external credit rating which, assessing the credit risk under the standardized method, are classified according to the issuer, issue or rating held by the institution itself. If an individual exposure has been rated by two assessment institutions then less the favourable assessment shall apply, in case three ratings are provided - two most favourable shall apply, in case two most favourable ratings do not coincide - then less favourable shall apply.

The Bank Group does not have a process for transferring issuer and issue credit ratings for similar assets that are not included in the trading book.

The association of the external rating of each nominated ECAI or ECA (referred to in paragraph one above) with the risk weights is consistent with the standard association published by EBA.

Template EU CR4 – standardised approach – Credit risk exposure and CRM effects

Exposure classes	Exposures before CCF and before CRM		Exposures post CCF and post CRM		RWAs and RWAs density	
	On-balance-sheet exposures	Off-balance-sheet exposures	On-balance-sheet exposures	Off-balance-sheet exposures	RWAs	RWAs density (%)
	a	b	c	d	e	f
1 Central governments or central banks	1,008,725		1,008,725		2,077	0.21%
2 Regional government or local authorities	37,987	458	37,987	229	10	0.03%
3 Public sector entities	645	920	21,268	9,225	493	1.62%
4 Multilateral development banks	777		777			0.00%
5 International organisations						
6 Institutions	39,068	2,020	36,675	1,010	12,167	32.29%
7 Corporates	317,797	127,270	300,260	52,725	303,197	85.90%
8 Retail	728,180	109,274	725,640	13,236	531,130	71.88%
9 Secured by mortgages on immovable property	2,089,671	144,249	2,083,107	65,277	976,874	45.47%
10 Exposures in default	58,209	2,370	57,196	1,185	62,544	107.13%
11 Exposures associated with particularly high risk	80 589	64,298	80,078	31,968	168,069	150.00%
12 Covered bonds						
13 Institutions and corporates with a short-term credit assessment						
14 Collective investment undertakings	29,020		3,146		28,642	910.43%
15 Equity	38,837		38,837		95,702	246.42%
16 Other items	128,565		127,462		47,925	37.60%
17 Total	4,558,070	450,859	4,521,158	174,855	2,228,830	47.46%

Template EU CR5 – standardised approach

Exposure classes	Risk weight								
	0%	2%	4%	10%	20%	35%	50%	70%	75%
	a	b	c	d	e	f	g	h	i
1 Central governments or central banks	1,004,570						4,155		
2 Regional government or local authorities	38,197						19		
3 Public sector entities	29,508						985		
4 Multilateral development banks	777								
5 International organisations									
6 Institutions					22,877		14,433		
7 Corporates							9,744		
8 Retail									738,876
9 Secured by mortgages on immovable property						836,605	1,010,305		
10 Exposures in default									
11 Exposures associated with particularly high risk									

(All amounts are in EUR thousand, unless otherwise stated)

12	Covered bonds								
13	Institutions and corporates with a short-term credit assessment								
14	Collective investment undertakings								
15	Equity								
16	Other items	79,537							
17	Total	1,152,589				22,877	836,605	1,039,641	738,876

(continued)

	Exposure classes	Risk weight						Total p	Of which unrated q
		100%	150%	250%	370%	1250%	Others		
		j	k	l	m	n	o		
1	Central governments or central banks						1,008,725	294,315	
2	Regional government or local authorities						38,216	38,216	
3	Public sector entities						30,493	30,493	
4	Multilateral development banks						777		
5	International organisations								
6	Institutions	375					37,685	1,332	
7	Corporates	343,241					352,985	323,847	
8	Retail						738,876	738,876	
9	Secured by mortgages on immovable property	301,473					2,148,383	2,148,384	
10	Exposures in default	50,054	8,327				58,381	58,381	
11	Exposures associated with particularly high risk		112,046				112,046	112,046	
12	Covered bonds								
13	Institutions and corporates with a short-term credit assessment								
14	Collective investment undertakings	929				2,217	3,146	3,146	
15	Equity	927		37,910			38,837	38,837	
16	Other items	47,925					127,462	127,462	
17	Total	744,924	120,373	37,910		2,217	4,696,012	3,915,335	

COUNTERPARTY CREDIT RISK

Table EU CCRA – Qualitative disclosure related to CCR

The Bank Group has short-term counterparty credit risk exposures arising from forward foreign exchange contracts. Given the size of the exposures, the Group is considered not to be exposed to significant counterparty risk and it is managed through credit risk with appropriate limits to restrict the maximum exposure amount. The collateral requirement is assessed on an individual basis. Due to insignificant counterparty exposures, a change in the Group's credit rating would not have a material impact on the amounts of collateral to be posted.

Template EU CCR1 – Analysis of CCR exposure by approach

		a	b	c	d	e	f	g	h
		Replacement cost (RC)	Potential future exposure (PFE)	EEPE	Alpha used for computing regulatory exposure value	Exposure value pre-CRM	Exposure value post-CRM	Exposure value	RWEA
EU-1	EU - Original Exposure Method (for derivatives)				1.4				
EU-2	EU - Simplified SA-CCR (for derivatives)	1,083	3,746		1.4	6,761	6,761	6,761	4,862
1	SA-CCR (for derivatives)				1.4				
2	IMM (for derivatives and SFTs)								
2a	<i>Of which securities financing transactions netting sets</i>								
2b	<i>Of which derivatives and long settlement transactions netting sets</i>								
2c	<i>Of which from contractual cross-product netting sets</i>								
3	Financial collateral simple method (for SFTs)					30,189	30,151	30,151	20,344
4	Financial collateral comprehensive method (for SFTs)								
5	VaR for SFTs								
6	Total					36,950	36,912	36,912	25,206

Template EU CCR2 – Transactions subject to own funds requirements for CVA risk

		a	b
		Exposure value	RWEA
1	Total transactions subject to the Advanced method		
2	i) VaR component (including the 3x multiplier)		
3	ii) stressed VaR component (including the 3x multiplier)		
4	Transactions subject to the Standardised method	321	75
EU-4	Transactions subject to the Alternative approach (Based on the Original Exposure Method)		
5	Total transactions subject to own funds requirements for CVA risk	321	75

Template EU CCR3 – Standardised approach – CCR exposures by regulatory exposure class and risk weights

Exposure classes	Risk weight											Total exposure value	
	a	b	c	d	e	f	g	h	i	j	k		
	0%	2%	4%	10%	20%	50%	70%	75%	100%	150%	Others		
1	Central governments or central banks												
2	Regional government or local authorities												
3	Public sector entities												
4	Multilateral development banks												
5	International organisations												

(All amounts are in EUR thousand, unless otherwise stated)

6	Institutions				2,272	121						2,393
7	Corporates							7,457				7,457
8	Retail							85				85
9	Institutions and corporates with a short-term credit assessment											
10	Other items				10,580					16,397		26,977
11	Total exposure value				10,580	2,272	121	85	23,854			36,912

Template EU CCR5 – Composition of collateral for CCR exposures

Collateral type		a	b	c	d	e	f	g	h
		Collateral used in derivative transactions				Collateral used in SFTs			
		Fair value of collateral received		Fair value of posted collateral		Fair value of collateral received		Fair value of posted collateral	
		Segregated	Unsegregated	Segregated	Unsegregated	Segregated	Unsegregated	Segregated	Unsegregated
1	Cash – domestic currency								
2	Cash – other currencies								
3	Domestic sovereign debt								
4	Other sovereign debt								
5	Government agency debt								
6	Corporate bonds	14,029							
7	Equity securities	73,109							
8	Other collateral								
9	Total	87,138							

Šiaulių bankas AB has no credit derivatives and no positions in the main counterparties.

SECURITISATION

Table EU-SECA - Qualitative disclosure requirements related to securitisation exposures

Securitisation means a transaction or scheme, whereby the credit risk associated with an exposure or a pool of exposures is tranching, having all of the following characteristics:

- payments in the transaction or scheme are dependent upon the performance of the exposure or of the pool of exposures;
- the subordination of tranches determines the distribution of losses during the ongoing life of the transaction or scheme.

In securitisations, risk is dependent on the seniority of the retained interest and the performance of the underlying asset pool.

Traditional securitisation means a securitisation involving the economic transfer of the exposures being securitised. This shall be accomplished by the transfer of ownership of the securitised exposures from the originator institution to an SSPE or through sub-participation by an SSPE. The securities issued do not represent payment obligations of the originator institution.

Synthetic securitisation is a form of securitisation where the transfer of risk is achieved by use of guarantees, but the exposures being securitised remain exposures of the originator institution.

OBJECTIVES AND MANAGEMENT OF CREDIT RISK

The underlying exposures of traditional securitisation are multi-apartment buildings modernisation loans. The Bank has long-term experience in financing renovation of multi-apartment buildings and considers these loans as product that benefits and is necessary for country economy (included in the critical function assessment by SRB), that reduces climate impact (~50 thousand tons of CO₂ to be saved each year) and profitable for the Bank.

The structure of the traditional non-STS securitisation transaction was created to leverage received European Structural and Investment Funds (ESIF) resources. These funds were entrusted to the EIB, as a fund manager, who set up a scheme in which these funds were structured as investment to first loss layer to absorb expected losses and increase the structure's attractiveness to investors and minimize the cost of borrowing resources. Administration fee income and interest on investments to securitization meet the Bank's target return.

The underlying exposures of synthetic securitisation are business loans and leases granted to small and medium enterprises (SMEs). The Bank provides loans and leases with a guarantee to encourage the financing of small and medium-sized businesses, while at the same time reducing the inherent risks that may be caused by providing credit to such companies. Having a guarantee allows Bank to finance projects when there is not enough collateral and usually under normal circumstances a loan or lease could not be granted. Providing such loans/leases with a guarantee allows the Bank to maintain the desired level of credit risk, and the companies using it - the opportunity to grow and strengthen their activities.

As all 4 originated securitisation transactions involved significant risk transfer, securitisation is used for optimisation of capital.

UAB "SB modernizavimo fondas" and UAB "SB modernizavimo fondas 2" are SSPEs that acquire exposures originated by the institution are sponsored by the institution and for that the institution provide securitisation-related services, such as asset servicing and management services. These SSPEs were established for two traditional securitisations.

Investors have no close links with the Bank. Nevertheless, first loss piece layer creditor of traditional securitisation transactions – pension funds are managed by management company UAB SB Asset Management, which is subsidiary of the Bank. Management company and pension funds are considered as separate legal personalities. The assets of pensions funds are fully segregated from the assets of management company, which manages pension funds under trust on the fiduciary basis.

Bank complies with risk retention rule in traditional securitisation transactions by keeping 5% of the First-Loss Piece Layer (Equity tranche), 50% of the Junior (Mezzanine) layer and 5% of the Senior Layer, so that total retention in the whole scheme would be not less than 5%.

Bank complies with risk retention rule in synthetic securitisation transactions by keeping 20% of the First-Loss Piece Layer (Equity tranche) and the whole Senior Layer, so the total retention in the whole scheme will be not less than 5%.

Bank applies Standardised Approach (SEC-SA) for capital requirements calculation of its all non-STS securitisation transactions. Bank has excluded underlying exposures from its calculation of risk-weighted exposure amounts as significant credit risk (SRT) associated with the underlying exposures has been transferred to third parties.

(All amounts are in EUR thousand, unless otherwise stated)

The European Structural, Investment Funds and ILTE (a National Promotional Bank) have reduced the risk of a securitization transactions structures, the target investors were known in advance and there was no expressed need for external ratings.

The same principles of risk management and monitoring are applied to securitisation positions and underlying loan portfolios.

ACCOUNTING POLICIES

The Bank accounts its investment to traditional securitisation at FVTPL (First-Loss tranche) and amortised cost (Mezzanine and Senior tranches). According to IFRS 9 if the entity transfers substantially all the risks and rewards of ownership of the financial asset, the entity shall derecognise the financial asset and recognise separately as assets or liabilities any rights and obligations created or retained in the transfer. De-recognition criteria for loans granted under the multi-apartment buildings modernisation program in Bank's accounts are met due to the contractual arrangements with EIB and other investors, so the underlying exposures will not be disclosed in Bank's loan portfolio.

In synthetic securitisation, the ownership of the securitised exposures remains with the Bank, that is, the exposures are accounted on the balance sheet. Credit risk is transferred with the use of financial guarantees.

Template EU-SEC1 - Securitisation exposures in the non-trading book

	a	b	c				e	f	g	h - k	I - o			
			Institution acts as originator									Sub-total	Institution acts as sponsor	Institution acts as investor
			Traditional		Synthetic									
STS	Non-STS	of which SRT	of which SRT	of which SRT										
1	Total exposures		68,864	68,864	55,086	55,086	123,950							
2	Retail (total)		68,864	68,864	55,086	55,086	123,950							
3	residential mortgage													
4	credit card													
5	other retail exposures		68,864	68,864	55,086	55,086	123,950							
6	re-securitisation													
7	Wholesale (total)													
8	loans to corporates													
9	commercial mortgage													
10	lease and receivables													
11	other wholesale													
12	re-securitisation													

Template EU-SEC2 - Securitisation exposures in the trading book

Not relevant

(All amounts are in EUR thousand, unless otherwise stated)

Template EU-SEC3 - Securitisation exposures in the non-trading book and associated regulatory capital requirements - institution acting as originator or as sponsor

		a	b	c	d	e	f	g	h	i	
		Exposure values (by RW bands/deductions)					Exposure values (by regulatory approach)				
		≤ 20 % RW	> 20 – 50% RW	> 50– 100% RW	> 100– 1 250 % RW	1250% RW/ deductions	SEC-IRBA	SEC-ERBA (including IAA)	SEC-SA	1250% RW / deductions	
1	Total exposures		50,168		72,782				123,950		
2	Traditional) transactions				68,864				68,864		
3	Securitisation				68,864				68,864		
4	Retail				68,864				68,864		
5	Of which STS										
6	Wholesale										
7	Of which STS										
8	Re-securitisation										
9	Synthetic transactions		50,168		4,918				55,086		
10	Securitisation		50,168		4,918				55,086		
11	Retail underlying		50,168		4,918				55,086		
12	Wholesale										
13	Re-securitisation										

(continued)

		j	k	l	m	n	o	EU-p	EU-q	
		RWEA (by regulatory approach)				Capital charge after cap				
		SEC-IRBA	SEC-ERBA (including IAA)	SEC-SA	1 250 % RW	SEC-IRBA	SEC-ERBA (including IAA)	SEC-SA	1 250 % RW	
1	Total exposures			105,950				8,476		
2	Traditional) transactions			74,830				5,986		
3	Securitisation			74,830				5,986		
4	Retail			74,830				5,986		
5	Of which STS									
6	Wholesale									
7	Of which STS									
8	Re-securitisation									
9	Synthetic transactions			31,120				2,490		
10	Securitisation			31,120				2,490		
11	Retail underlying			31,120				2,490		
12	Wholesale									
13	Re-securitisation									

Template EU-SEC4 - Securitisation exposures in the non-trading book and associated regulatory capital requirements - institution acting as investor

Not relevant

Template EU-SEC5 - Exposures securitised by the institution - Exposures in default and specific credit risk adjustments

		a	b	c
		Exposures securitised by the institution - Institution acts as originator or as sponsor		
		Total outstanding nominal amount	Of which exposures in default	Total amount of specific credit risk adjustments made during the period
1	Total exposures	428,833	3,658	0
2	Retail (total)	428,833	3,658	0
3	residential mortgage			
4	credit card			
5	other retail exposures	428,833	3,658	0
6	re-securitisation			
7	Wholesale (total)			
8	loans to corporates			
9	commercial mortgage			
10	lease and receivables			
11	other wholesale			
12	re-securitisation			

MARKET RISK

Table EU MRA: Qualitative disclosure requirements related to market risk

The strategic focus of the Bank Group's activities – the provision of banking services to small and medium-sized businesses and private individuals, as well as project financing in cooperation with international organisations, state and local governments – makes the impact of the Group's trading activities on the Group's overall business activities not significant.

Qualitative information on market risk management is provided in the Explanatory Notes to the 2024 Financial Statements under "Financial Risk Management", section 2 "Market Risk" (page 52).

Template EU MR1 - Market risk under the standardised approach

		a
		RWEAs
Outright products		
1	Interest rate risk (general and specific)	16,652
2	Equity risk (general and specific)	44
3	Foreign exchange risk	
4	Commodity risk	
Options		
5	Simplified approach	

(All amounts are in EUR thousand, unless otherwise stated)

6	Delta-plus approach	
7	Scenario approach	
8	Securitisation (specific risk)	
9	Total	16,696

Table EU ORA - Qualitative information on operational risk

Qualitative information on operational risk is provided in the Explanatory Notes to the 2024 Financial Statements under “Financial Risk Management”, section 6 “Operational Risk” (p. 70).

The Group uses the Basic Indicator Approach to assess minimum own funds requirements.

Template EU OR1 - Operational risk own funds requirements and risk-weighted exposure amounts

Banking activities		a	b	c	d	e
		Relevant indicator			Own funds requirements	Risk exposure amount
		Year-3	Year-2	Last year		
1	Banking activities subject to basic indicator approach (BIA)	138,844	184,662	204,258	26,388	329,853
2	Banking activities subject to standardised (TSA) / alternative standardised (ASA) approaches					
3	<u>Subject to TSA:</u>					
4	<u>Subject to ASA:</u>					
5	Banking activities subject to advanced measurement approaches AMA					

REMUNERATION

Information on remuneration policies is provided in the Consolidated Annual Report 2024, section “Remuneration Policy” (page 150) and Remuneration information for 2024 (page 183).

The unit of measurement used to disclose the remuneration component is the euro.

Template EU REM1 - Remuneration awarded for the financial year

		a	b	c	d
		MB Supervisory function	MB Management function	Other senior management	Other identified staff
Fixed remuneration	Number of identified staff	7	12	2	20
	Total fixed remuneration	743,655.98	2,002,960.20	243,641.43	2,173,697.94
	Of which: cash-based	743,655.98	1,879,895.72	229,792.66	2,071,809.83
	(Not applicable in the EU)				
	Of which: shares or equivalent ownership interests				
	Of which: share-linked instruments or equivalent non-cash instruments				
	Of which: other instruments				

(All amounts are in EUR thousand, unless otherwise stated)

	(Not applicable in the EU)				
	Of which: other forms		123,064.48	13,848.77	101,888.11
	(Not applicable in the EU)				
Variable remuneration	Number of identified staff		12	2	20
	Total variable remuneration		1,190,690.00	109,180.00	914,820.00
	Of which: cash-based		178,435.00	20,830.00	549,450.00
	Of which: deferred		0.00	0.00	
	Of which: shares or equivalent ownership interests		1,012,255.00	88,350.00	365,370.00
	Of which: deferred		1,012,255.00	88,350.00	365,370.00
	Of which: share-linked instruments or equivalent non-cash instruments				
	Of which: deferred				
	Of which: other instruments				
	Of which: deferred				
	Of which: other forms				
	Of which: deferred				
Total remuneration (2 + 10)		743,655.98	3,193,650.20	352,821.43	3,088,517.94

The number of the Nominated employees had been identified based on the Nominated posts they hold as at 31 December 2024.

Template EU REM2 - Special payments to staff whose professional activities have a material impact on institutions' risk profile (identified staff)

		a	b	c	d
		MB Supervisory function	MB Management function	Other senior management	Other identified staff
	Guaranteed variable remuneration awards				
1	Guaranteed variable remuneration awards - Number of identified staff				
2	Guaranteed variable remuneration awards -Total amount				
3	Of which guaranteed variable remuneration awards paid during the financial year, that are not taken into account in the bonus cap				
	Severance payments awarded in previous periods, that have been paid out during the financial year				
4	Severance payments awarded in previous periods, that have been paid out during the financial year - Number of identified staff				
5	Severance payments awarded in previous periods, that have been paid out during the financial year - Total amount				
	Severance payments awarded during the financial year				
6	Severance payments awarded during the financial year - Number of identified staff				
7	Severance payments awarded during the financial year - Total amount				44,940
8	Of which paid during the financial year				
9	Of which deferred				
10	Of which severance payments paid during the financial year, that are not taken into account in the bonus cap				
11	Of which highest payment that has been awarded to a single person				

(All amounts are in EUR thousand, unless otherwise stated)

Template EU REM3 - Deferred remuneration

	a	b	c	d	e	f	EU-g	EU-h
Deferred and retained remuneration	Total amount of deferred remuneration awarded for previous performance periods	Of which due to vest in the financial year	Of which vesting in subsequent financial years	Amount of performance adjustment made in the financial year to deferred remuneration that was due to vest in the financial year	Amount of performance adjustment made in the financial year to deferred remuneration that was due to vest in future performance years	Total amount of adjustment during the financial year due to ex post implicit adjustments (i.e. changes of value of deferred remuneration due to the changes of prices of instruments)	Total amount of deferred remuneration awarded before the financial year actually paid out in the financial year	Total of amount of deferred remuneration awarded for previous performance period that has vested but is subject to retention periods
1 MB Supervisory function								
2 Cash-based								
3 Shares or equivalent ownership interests								
4 Share-linked instruments or equivalent non-cash instruments								
5 Other instruments								
6 Other forms								
7 MB Management function	969,795.00		969,795.00				667,223.99	
8 Cash-based								
9 Shares or equivalent ownership interests	969,795.00		969,795.00				667,223.99	
10 Share-linked instruments or equivalent non-cash instruments								
11 Other instruments								
12 Other forms								
13 Other senior management	88,350.00		88,350.00				50,168.64	
14 Cash-based								
15 Shares or equivalent ownership interests	88,350.00		88,350.00				50,168.64	
16 Share-linked instruments or equivalent non-cash instruments								
17 Other instruments								
18 Other forms								
19 Other identified staff	365,370.00		365,370.00				421,325.00	
20 Cash-based								
21 Shares or equivalent ownership interests	365,370.00		365,370.00				421,325.00	
22 Share-linked instruments or equivalent non-cash instruments								
23 Other instruments								

(All amounts are in EUR thousand, unless otherwise stated)

24	Other forms								
25	Total amount	1,423,515.00		1,423,515.00				1,138,717.63	

Template EU REM4 - Remuneration of 1 million EUR or more per year

The Bank Group does not have staff that are high earners as set out in Article 450(i) CRR.

Template EU REM5 - Information on remuneration of staff whose professional activities have a material impact on institutions' risk profile (identified staff)

	a	b	c	d	e	f	g	h	i	j	
	Management body remuneration			Business areas							
	MB Supervisory function	MB Management function	Total MB	Investment banking	Retail banking	Asset management	Corporate functions	Independent internal control functions	All other	Total	
Total number of identified staff										34	
Of which: members of the MB	7	12	19								
Of which: other senior management								1			
Of which: other identified staff				1	9		1	4	6		
Total remuneration of identified staff	743,655.98	3,193,650.20	3,937,306.18	103,584.48	1,723,188.17		226,048.97	687,972.27	696,847.67		
Of which: variable remuneration		1,190,690.00	1,190,690.00	9,640.00	593,920.00		88,350.00	93,470.00	115,900.00		
Of which: fixed remuneration	743,655.98	2,002,960.20	2,746,616.18	93,944.48	1,129,268.17		137,698.97	594,502.27	580,947.67		

The number of the Nominated employees had been identified based on the Nominated posts they hold as at 31 December 2024.

INFORMATION ABOUT ASSET ENCUMBRANCE

Template EU AE1 - Encumbered and unencumbered assets

		Carrying amount of encumbered assets		Fair value of encumbered assets		Carrying amount of unencumbered assets		Fair value of unencumbered assets	
		010	030	040	050	060	080	090	100
010	Assets of the disclosing institution	262,865	262,770			4,520,648	974,040		
030	Equity instruments					2,975		2,975	
040	Debt securities	259,275	259,275	252,640	252,640	575,038	540,837	563,045	528,746
050	of which: covered bonds								
060	of which: securitisations								

(All amounts are in EUR thousand, unless otherwise stated)

070	of which: issued by general governments	259,275	259,275	252,640	252,640	496,561	491,699	491,117	488,598
080	of which: issued by financial corporations					26,149	20,991	25,862	11,236
090	of which: issued by non-financial corporations					47,196	28,299	46,643	27,834
120	Other assets	3,386	3,293			3,939,912	433,203		

Template EU AE2 - Collateral received and own debt securities issued

		Fair value of encumbered collateral received or own debt securities issued		Unencumbered	
				Fair value of collateral received or own debt securities issued available for encumbrance	
		010	of which notionally eligible EHQLA and HQLA 030	040	of which EHQLA and HQLA 060
130	Collateral received by the disclosing institution	84,145			
140	Loans on demand				
150	Equity instruments	73,323			
160	Debt securities	14,807			
170	of which: covered bonds				
180	of which: securitisations				
190	of which: issued by general governments				
200	of which: issued by financial corporations	10,433			
210	of which: issued by non-financial corporations				
220	Loans and advances other than loans on demand				
230	Other collateral received				
240	Own debt securities issued other than own covered bonds or securitisations				
241	Own covered bonds and securitisations issued and not yet pledged				
250	TOTAL COLLATERAL RECEIVED AND OWN DEBT SECURITIES ISSUED	359,978	262,770		

Template EU AE3 - Sources of encumbrance

		Matching liabilities, contingent liabilities or securities lent	Assets, collateral received and own debt securities issued other than covered bonds and securitisations encumbered
		010	030
010	Carrying amount of selected financial liabilities	280,307	358,357

Table EU AE4 - Accompanying narrative information

The median exposure values are obtained by calculating the median of the sums of the ending values of the four quarterly periods of the preceding 12-month period.

The majority of the Bank Group's encumbered assets (about 99%) are pledged to the central bank. This constraint is due to the TLTRO loan from the Central Bank. The TLTRO loan was repaid during the year.

Apart from the Bank, the assets of other entities in the financial group are not encumbered.

Around 3% of the items included in column 060 "Carrying amount of unencumbered assets" and row 120 "Other assets" of the EU AE1 form consist of items that in the ordinary course of business are not considered to be assets that can be encumbered (derivatives of EUR 0.8 million, investments in subsidiaries and associates of EUR 37 million, tangible fixed assets of EUR 15 million, intangible assets of EUR 41 million, deferred tax assets of EUR 7 million, other assets of EUR 14 million, assets held for sale of EUR 0.2 million).

The bulk of the encumbrance (around 72%) in line 010 of the EU AE3 form "Carrying amount of certain financial liabilities" relates to the liability to the central bank under the TLTRO, which was repaid during the year.

DISCLOSURE OF INTEREST RATE RISK FOR POSITIONS NOT INCLUDED IN THE TRADING BOOK

Table EU IRRBBA - Qualitative information on interest rate risks of non-trading book activities

Bank identifies the following sources of interest rate risk: GAP (repricing) risk; option risk, basis risk. Bank calculate changes in net interest income (over 1 year period) and changes in economic value of equity. Bank manages IRRBB risk using asset and liability management – debt securities portfolio formation principles and deposit pricing according to its term.

Bank is calculating net interest income and economic value of equity measures on the monthly basis.

Bank measures changes in earnings using 200 bp up/down interest rate scenario. The impact of interest rates shocks on EVE is assessed based on scenarios 1-6 set out in annex III in guidelines EBA/GL/2018/02 and EBA/RTS/2022/10.

Stress testing baseline scenario is build using interest rate 10 year period historical data and market interest rate forecast for the upcoming year. Adverse scenarios is calculated from interest rate historical data covering the 2008 financial crisis.

IRRBB hedging is not applicable.

Cash flows are modelled according to their repricing or maturity dates which are either contractually fixed or based on behavioural (prepayments for fixed interest rate loans, core part for non-maturing deposits. term deposit early termination) assumptions. Cash flows are modelled dependent on interest rate scenarios and including behaviour and automatic optionality. Euribor forward rates are used for cash flow repricing in the future. In EVE calculation embedded option valuation is included.

EVE and NII measures are significant, because Bank has defined IRRBB risk appetite and set risk limits (EVE and NII) based on risk appetite.

Average repricing maturity for retail non-maturity deposits 0,87 years and 0.5 years for wholesale non-financial non-maturity deposits. Longest repricing maturity of non-maturity deposits is 2 years.

Template EU IRRBB1 - Interest rate risks of non-trading book activities

Supervisory shock scenarios		a	b	c	d
		Changes of the economic value of equity		Changes of the net interest income	
		Current period	Last period	Current period	Last period
1	Parallel up	-1.039	-18.564	38.408	34.855
2	Parallel down	18.57	22.218	-38.867	-34.861
3	Steeper	-6.803	122		
4	Flattener	6.325	-3.876		
5	Short rates up	6.509	-7.963		
6	Short rates down	-4.41	8.125		

MREL

EU KM2: Key metrics - MREL and, where applicable, G-SII requirement for own funds and eligible liabilities

		a	b	c	d	e	f
		Minimum requirement for own funds and eligible liabilities (MREL)	G-SII Requirement for own funds and eligible liabilities (TLAC)				
		31.12.2024	T	T-1	T-2	T-3	T-4
Own funds and eligible liabilities, ratios and components							
1	Own funds and eligible liabilities	961,210					
EU-1a	Of which own funds and subordinated liabilities	660,034					
2	Total risk exposure amount of the resolution group (TREA)	2,706,609					
3	Own funds and eligible liabilities as a percentage of the TREA	0.3551					
EU-3a	Of which own funds and subordinated liabilities	0.2439					
4	Total exposure measure (TEM) of the resolution group	5,008,786					
5	Own funds and eligible liabilities as percentage of the TEM	0.1919					
EU-5a	Of which own funds or subordinated liabilities	0.1318					
6a	Does the subordination exemption in Article 72b(4) of Regulation (EU) No 575/2013 apply? (5 % exemption)						
6b	Aggregate amount of permitted non-subordinated eligible liabilities instruments if the subordination discretion in accordance with Article 72b(3) of Regulation (EU) No 575/2013 is applied (max 3,5 % exemption)						
6c	If a capped subordination exemption applies in accordance with Article 72b (3) of Regulation (EU) No 575/2013, the amount of funding issued that ranks <i>pari passu</i> with excluded liabilities and that is recognised under row 1, divided by funding issued that ranks <i>pari passu</i> with excluded liabilities and that would be recognised under row 1 if no cap was applied (%)						

(All amounts are in EUR thousand, unless otherwise stated)

Minimum requirement for own funds and eligible liabilities (MREL)			
EU-7	MREL expressed as a percentage of the TREA	0.2267	
EU-8	Of which to be met with own funds or subordinated liabilities	0.1350	
EU-9	MREL expressed as a percentage of the TEM	0.0709	
EU-10	Of which to be met with own funds or subordinated liabilities	0.0595	

EU TLAC1. Composition - MREL and, where applicable, G-SII Requirement for own funds and eligible liabilities

		a	b	c
		Minimum requirement for own funds and eligible liabilities (MREL)	G-SII requirement for own funds and eligible liabilities (TLAC)	Memo item: Amounts eligible for the purposes of MREL, but not of TLAC
Own funds and eligible liabilities and adjustments				
1	Common Equity Tier 1 capital (CET1)	511,905		
2	Additional Tier 1 capital (AT1)	50,145		
3	Empty set in the EU			
4	Empty set in the EU			
5	Empty set in the EU			
6	Tier 2 capital (T2)	97,984		
7	Empty set in the EU			
8	Empty set in the EU			
11	Own funds for the purpose of Articles 92a of Regulation (EU) No 575/2013 and 45 of Directive 2014/59/EU	660,034		
Own funds and eligible liabilities: Non-regulatory capital elements				
12	Eligible liabilities instruments issued directly by the resolution entity that are subordinated to excluded liabilities (not grandfathered)			
EU-12a	Eligible liabilities instruments issued by other entities within the resolution group that are subordinated to excluded liabilities (not grandfathered)			
EU-12b	Eligible liabilities instruments that are subordinated to excluded liabilities issued prior to 27 June 2019 (subordinated grandfathered)			
EU-12c	Tier 2 instruments with a residual maturity of at least one year to the extent they do not qualify as Tier 2 items	88		
13	Eligible liabilities that are not subordinated to excluded liabilities (not grandfathered pre-cap)	301,088		
EU-13a	Eligible liabilities that are not subordinated to excluded liabilities issued prior to 27 June 2019 (pre-cap)			
14	Amount of non-subordinated eligible liabilities instruments, where applicable after application of Article 72b (3) CRR	301,088		
15	Empty set in the EU			
16	Empty set in the EU			

(All amounts are in EUR thousand, unless otherwise stated)

17	Eligible liabilities items before adjustments	301,176		
EU-17a	Of which subordinated liabilities items	88		
Own funds and eligible liabilities: Adjustments to non-regulatory capital elements				
18	Own funds and eligible liabilities items before adjustments	961,210		
19	(Deduction of exposures between multiple point of entry (MPE) resolution groups)			
20	(Deduction of investments in other eligible liabilities instruments)			
21	Empty set in the EU			
22	Own funds and eligible liabilities after adjustments	961,210		
EU-22a	Of which: own funds and subordinated liabilities	660,034		
Risk-weighted exposure amount and leverage exposure measure of the resolution group				
23	Total risk exposure amount (TREA)	2,706,609		
24	Total exposure measure (TEM)	5,008,786		
Ratio of own funds and eligible liabilities				
25	Own funds and eligible liabilities as a percentage of TREA	0.3551		
EU-25a	Of which own funds and subordinated liabilities	0.2439		
26	Own funds and eligible liabilities as a percentage of TEM	0.1919		
EU-26a	Of which own funds and subordinated liabilities	0.1318		
27	CET1 (as a percentage of the TREA) available after meeting the resolution group's requirements	0.1099		
28	Institution-specific combined buffer requirement			
29	of which capital conservation buffer requirement			
30	of which countercyclical buffer requirement			
31	of which systemic risk buffer requirement			
EU-31a	of which Global Systemically Important Institution (G-SII) or Other Systemically Important Institution (O-SII) buffer			
Memorandum items				
EU-32	Total amount of excluded liabilities referred to in Article 72a(2) of Regulation (EU) No 575/2013			

EU TLAC3b: creditor ranking - resolution entity

	Description of insolvency rank (free text)	Insolvency ranking					Sum of 1 to 6
		1	2	3	5	6	
		(most junior)				(most senior)	
1		Shareholders' equity (CET1)	Non-equity securities issued (AT1 capital)	Subordinated securities (T2 capital)	Bank creditors not mentioned elsewhere	Share of deposits of natural persons and SMEs in excess of the insured amount	
2	Empty set in the EU						
3	Empty set in the EU						
4	Empty set in the EU						
5	Own funds and liabilities potentially eligible for meeting MREL	511,905	50,145	97,984	300,029	1,147	961,210

(All amounts are in EUR thousand, unless otherwise stated)

6	of which residual maturity \geq 1 year < 2 years					1,147	1,147
7	of which residual maturity \geq 2 year < 5 years			20,027	300,029		320,056
8	of which residual maturity \geq 5 years < 10 years			77,957			77,957
9	of which residual maturity \geq 10 years, but excluding perpetual securities						
10	of which perpetual securities	511,905	50,145				562,050

DISCLOSURE OF ENVIRONMENTAL, SOCIAL AND GOVERNANCE RISKS (ESG RISKS)

Qualitative information on Environmental risk, on Social risk and on Governance risk

BUSINESS STRATEGY AND PROCESSES

In 2024, Šiaulių Bankas introduced its long-term strategy for 2024–2029, aiming to become the leading bank in the Lithuanian banking sector by 2029. The bank is committed to delivering the best customer experience, being the top choice in customers' minds, outpacing market growth in both customer base and loan portfolio, and generating a strong double-digit return for investors.

Strategic priorities:

- Implementation of a new core banking platform,
- Customer-centric approach,
- Commitment to a Phygital strategy,
- Regulatory compliance,
- Brand transformation,
- ESG.

Strengthening the ESG area is one of the strategic priorities. The ESG strategy is an integral part of the Group's strategy and initiatives will continue to be implemented in relation to the key strategic directions in the area of ESG:

- **Environment:** Reducing environmental impact,
- **Social:** Developing access to services and engaged employees,
- **Governance:** Responsible operations, transparency and reliable services.

In 2024, the Group conducted a **Double Materiality Assessment**, evaluating risks and opportunities that could financially impact the Group's operations (financial materiality) and assessing the Group's positive and negative impacts on the environment and society (impact materiality). Following a comprehensive Double Materiality Assessment, the key material topics (including sub-topics and sub-sub-topics) were identified:

- Climate change (climate change mitigation, adapting to climate change, energy).
- Own workforce (working conditions (fair pay, social dialogue, freedom of association, collective bargaining, health and safety), equal treatment and equal opportunities for all (gender equality and equal pay for work of equal value, training and skills development), other work-related rights (privacy)).
- Consumers and end-users (information-related impacts on consumers and/or end-users (privacy, access to (quality) information), social inclusion of consumers and/or end-users (non-discrimination, access to products and services, responsible marketing)
- Business ethics (corporate culture, corruption and bribery).

The Double Materiality Assessment process and results (materiality matrix) and the interaction between material impacts, risks, and opportunities with the strategy and business model are detailed in the Šiaulių Bankas Group's 2024 Sustainability Report, which is part of the Bank's Financial Statements and Annual Report for 2024.

In 2024, when reviewing ESG strategy, which is an integral part of the Group's strategy, also was taken into account the results of the Double Materiality Assessment and the identified material topics.

Science Based Targets initiative (SBTi). In January 2024, the Bank joined the international Science Based Targets initiative (SBTi) as part of its commitment to actively contribute to climate change mitigation. The Bank has pledged to become climate-neutral by 2050 and to set near-term targets aligned with the trajectory for achieving the 2050 goals. By joining this initiative, the Bank has committed to defining targets and measures for reducing greenhouse gas (GHG) emissions within the next two years and ensuring their alignment with the SBTi standards.

Green Products and Energy Efficiency-Oriented Products Šiaulių Bankas AB offers its clients green and energy efficiency-focused products, aiming to expand the availability of sustainable financial services. The green product categories are: green mortgage loans, special terms for leasing electric and hybrid vehicles, and projects to improve business sustainability.

In 2024, the Bank issued €14.7 million in green home loans that comply with the requirements of the EU Taxonomy Regulation (Regulation (EU) 2020/852). In comparison, in 2023, the Bank issued €9.74 million in such loans. The development of green home financing enables the Bank to offer its clients more favorable conditions for purchasing environmentally friendly housing. For the 2024 financial year, the Bank discloses information on the share of taxonomy-aligned and taxonomy-eligible assets within its total assets in the Šiaulių Bankas Group's 2024 Sustainability Report.

Šiaulių Bankas AB contributes to the development of renewable energy projects in the country – in 2024, it financed the acquisition and installation of solar and wind power plants for almost EUR 55 million.

Loans on more favorable terms are available for electric and hybrid vehicles, which contribute to a more sustainable environment. The purpose of financing such cars is to make more environmentally friendly vehicles more affordable and to encourage buyers to seriously consider purchasing them. The main advantage offered to clients is more attractive interest rates.

The Bank is the main financing partner for multi-apartment building modernization projects in the country. Over the period 2011-2023, the Bank has financed multi-apartment building renovation projects worth EUR 1 billion.

In 2025, the Bank will continue to focus on financing other projects that improve business sustainability, such as:

- Renewable energy,
- Energy efficiency improvement projects,
- Waste management projects,
- Emission reduction projects,
- Sustainable forestry projects,
- Water and wastewater management projects.

Šiaulių Bankas places significant emphasis on commitments related to environmental requirements, social responsibility, employee health and safety, business ethics, and governance. The Bank continuously improves its operations and raises its standards, expecting that clients and suppliers it collaborates with will adhere to similar commitments and/or standards.

Clients. Bank's customers are direct beneficiaries of the Bank's and the Group's products and services. Customers maintain direct relations with the Group, perform various operations, such as opening accounts, taking out loans, using investment products or other Group services.

The Bank, in accordance with the requirements of relevant legal acts, has regulated rules, processes and systems that it uses to get to know its customers as best as possible both before the start of business relations and during business relations. Knowing the customer before starting business relations includes the following main stages: establishing, verifying and updating the identity of the customer and the beneficiary; collecting, verifying and assessing information about the customer; assessing the acceptability of the customer, etc. Meanwhile, continuous knowing the customer during business relations includes the following main stages: periodic and ad-hoc updates of knowing the customer information and internal analysis and assessment processes.

During the customer due diligence process, all information related to the customer and submitted to the Bank is collected, verified and assessed, including information about the customer's beneficiaries - controlling legal entities and/or individuals.

When making decisions on lending to business customers, the Bank is guided by the requirements of legal acts and has separate specialized Bank procedures and processes that regulate in detail the actions related to the lending process and the principles of credit risk management. During the lending process, not only the specifics of the customer's activities and financial indicators are assessed, but also the customer's business management (history, experience of shareholders and managers) and shareholder structure (control and economic relations, influence on the company's financial management). Possible problems with the company's management or fundamental changes that may result in significant strategic changes in operations, affect the company's reputation, etc. are also taken into account. When determining the company's risk group, the final result is influenced by the reputation and experience of shareholders and managers, for which appropriate scores are assigned.

During the credit risk assessment (rating) process of business customers, potential changes in customer risk due to ESG risk (together with increased climate and environmental risk) are assessed. Therefore, in order to meet the supervisory requirements applicable to the Bank, the Bank has included ESG risk assessment of customers in the business customer lending process:

- The Bank provides an ESG risk questionnaire to business clients, aiming to determine their ESG risk level and encourage them to implement ESG risk mitigation measures in their operations. The questionnaire consists of both qualitative and quantitative questions and covers all three ESG components: environmental, social, and governance risks.
- The Bank also collects clients' GHG data alongside their annual financial statements.
- The ESG risk assessment is integrated into the business client credit risk assessment (rating) process and client risk monitoring process.
- The ESG risk evaluation influences credit risk assessment and pricing, with social and corporate governance factors embedded into the business client rating system.
- Internal policies ensure proper risk management, while internal control measures secure the implementation of ESG principles.

In 2024, the ESG risk assessment process and methodology were updated based on the results of the significantly revised Climate and Environmental Risk Materiality Assessment, as well as in alignment with relevant regulations and methodologies.

Suppliers. The Bank's approach to supplier relationships is based on expectations outlined in the policy "Prevention of Corruption and Unacceptable Conduct" which requires suppliers to comply with ESG requirements. In cases of

non-compliance, the situation is assessed, and the Bank reserves the right to terminate the collaboration. To maintain responsible and transparent relationships, the Bank actively monitors and evaluates its suppliers, ensuring adherence to ethical standards and legal requirements. This proactive approach mitigates risks and ensures that the Bank's operations remain sustainable and responsible.

The "Supplier Code of Conduct," approved by the Bank's Board, reflects the Group's commitment to fostering sustainable partnerships with suppliers. This document establishes minimum obligations and ethical business conduct standards expected from all suppliers.

The Bank conducts a supplier due diligence process to identify, assess, and manage any potential or actual negative impact on society and the environment caused by major suppliers. This process includes analysing supplier-provided information and implementing additional measures to ensure supply chain responsibility. The due diligence process consists of:

- Questionnaire Submission – Major suppliers receive a comprehensive due diligence questionnaire to evaluate their impact and ESG risk mitigation measures. The questionnaire includes qualitative and quantitative questions covering all three ESG aspects: environmental, social, and governance risks.
- Response Analysis – Supplier responses are reviewed to assess potential impacts. The questionnaire is aligned with the Group's Supplier Code of Conduct, ensuring consistency with the Bank's strategic goals and values.
- Request for Additional Documents – If the answers to the questionnaire are not sufficient to assess the risk, additional documents or evidence may be requested.

The Bank regularly reviews the effectiveness of supplier risk management and conducts additional assessments in the event of significant changes. While the current process focuses on major suppliers, the Bank plans to expand and refine the due diligence scope over time to ensure comprehensive impact management.

Management

Different management bodies are responsible for managing ESG risk and ESG strategy in the Bank and Group companies.

Bank's Supervisory Council:

- At the level of the Bank's Supervisory Council, the Chairperson of the Supervisory Council is responsible for the area of ESG;
- Approves the Group's strategy, including the ESG strategy, which is an integral part of the Group's strategy;
- Approves the Bank's Risk Management Strategy and Risk Appetite Statement (together with ESG key risk indicators).

Bank's Management Board:

- At the level of the Bank's Management Board, direct oversight of ESG risk management is the responsibility of a member of the Management Board, who is also the Bank's Chief Risk Officer (CRO) holding the position of the Head of the Bank's Risk Management Division, and who has the ability to raise issues directly with the Management Board, the Risk Committee, and the Supervisory Council as necessary.
- The Bank's Management Board approves the ESG risk impact assessment for the Bank's operations, as well as the Climate and environmental risk materiality assessment and the Business environment scan (**once a year**).
- The Bank's Management Board is the top-level governance body responsible for aligning and integrating the ESG strategy into the Group's strategy and submitting it to the Bank's Supervisory Council for

approval, as well as for the **annual** review of the implementation of the ESG strategy and the formulation of the strategic objectives of ESG within the context of the Group's strategy.

Risk Committee:

- Oversees ESG risk management in the Bank (**quarterly**);
- Conducts periodic monitoring of ESG risk indicators and overall ESG risk management (**quarterly**).
- Considers, on a proposal from the Bank's Management Board, changes to the ESG key risk indicators approved by the Supervisory Council;
- Conducts a deep dive into detailed ESG analyses as required.

Audit Committee

- Oversees the process of ensuring the integrity of the Bank's and Group's annual reports, including sustainability information.

Nomination Committee

- Monitors and assesses whether the Bank's governing bodies and key function holders have the core competencies required, including ESG risk management competencies.

Risk Management Committee:

- The Chief Risk Officer (CRO) chairs the Bank's Risk Management Committee;
- Oversees ESG risk management in the Bank (**monthly**);
- Conducts periodic monitoring of ESG risk indicators and overall ESG risk management (**monthly**).

Sustainable Action Group:

- The Sustainable Action Group is chaired by the Sustainability Officer;
- The Sustainable Action Group is composed of a total of 13 members from 7 different divisions (Chief Risk Officer, Director of the Risk Department, Director of the Credit Risk Management and Control Department, Director of the Product Development Department, Director of the Compliance Department, Director of the Personnel Department, the Sustainability Officer and other managers and specialists participate in the activities);
- The Sustainable Action Group is an advisory body on ESG risks and on the development of the ESG strategy, and conducts **quarterly** oversight of the implementation of the ESG strategy.

Other structural units, committees and functions:

- Banking Product Committee – responsible for the development of banking products, including green products, as well as products focused on improving energy efficiency and promoting a sustainable business model, and ESG risks are among the risks assessed in product development.
- Loan Committee – decides whether to grant loans to clients. The ESG risk class is also taken into account when considering lending.
- Retail Banking and Corporate Banking Divisions – provide financing proposals to clients, also focused on improving energy efficiency and promoting a sustainable business model. Assesses the level of ESG risk of clients (first line of defence).
- Investment services – when investing, effort is made to avoid the negative impact of ESG risks on the price and liquidity of securities in the long term, and therefore compliance with the ESG criteria is assessed.
- Non-Financial Risks Department coordinates ESG risk management and control processes within the Group (second line of defence), prepares internal legal acts to manage the risk, and oversees their implementation.
- Compliance Department – performs an internal control function of the ESG risk management system for compliance with legal acts (the second line of defence), and also performs compliance inspections.
- Internal Audit – the third line of defence, carrying out independent ESG audits on a risk basis, assessing the effectiveness of the ESG risk management control framework, making recommendations to strengthen

the effectiveness of the ESG risk management control framework, and monitoring the implementation of the recommendations. Provides materials to the Bank’s Audit Committee on issues identified during audits, recommendations made and their implementation. Advises on ESG risk management issues as needed.

Part of the activities of the Group companies (Life insurance company SB Draudimas UAB, SB Asset Management UAB, SB Lizingas UAB) are integrated into the Bank’s activities, therefore the above-mentioned Bank’s committees and commissions deal with the ESG risk management issues of the subsidiaries. However, the subsidiaries have committees dedicated solely to their activities.

The Bank also has a **Labour Council**, made up of 11 staff members elected by secret ballot and holding various positions in the Bank. The activities of the Council are governed by its rules of procedure. It actively cooperates with the Bank’s Human Resources, Asset Management and Administration and other departments, providing proposals that, among other things, reflect the ESG topics of interest to employees, in order to find the best solutions for the well-being of employees. The Group companies Life insurance company SB Draudimas UAB and SB Asset Management UAB also have Labour Councils, which operate on a similar basis to the Labour Council of the Bank.

More information in the Šiaulių Bankas Group’s 2024 Sustainability Report.

Integration of sustainability-related performance in incentive schemes. The Group’s remuneration system is currently not directly linked to the achievement of sustainability objectives (including the reduction of greenhouse gas (GHG) emissions). However, ESG objectives can be measured in terms of the achievement of the overall objectives of the organisation or assigned to specific posts with direct responsibility for this area. Currently, performance measurement is not directly based on specific sustainability-related targets or their impact, nor are ESG performance indicators considered as benchmarks for performance measurement or integrated into remuneration policies. However, the Group regularly reviews its remuneration system and its publicly disclosed Remuneration Policy and would, therefore, consider future improvements to better integrate sustainability objectives into its incentive and remuneration framework.

Risk management

Bank’s ESG risk management contains of:

<i>Components of the ESG risk management system:</i>	<i>Processes within the Bank:</i>	
<i>Risk identification</i>	Identification of ESG risks (Double Materiality Assessment); Climate and environmental risk materiality assessment; Business environment scan.	
<i>Risk assessment</i>	Risk assessment process (Risk Map); GHG emissions from financing and investment activities; Stress testing and evaluation of results as part of the Internal Capital Adequacy Assessment Process (ICAAP); Green asset indicator	The Risk Management Strategy defines the Group’s policy for identifying, assessing and managing risks. The risk appetite statement defines the level of risk that the Group is willing to take in order to achieve its business objectives.
<i>Risk management</i>	Managing ESG risk as a distinct type of risk; Integrating ESG risk management into the management of other financial and non-financial risks.	
<i>Risk monitoring and reporting</i>	Internal reporting (see page 195 of the statement for details on the functions of the governing bodies); External reporting (public disclosure).	

In 2024, the Bank continued to improve its ESG risk management framework by significantly updating its Climate and environmental risk materiality assessment, which has been linked to the Double Materiality Assessment, as well as by conducting a comprehensive Business environment scan, updating the Risk Appetite Statement accordingly,

and reviewing and updating the ESG risk indicators. The climate and environmental risks and the assessment of their impacts are a regular process in the Bank, which is assessed at each review of the Group’s strategy and Risk Management Framework. The Group’s new strategy (2024-2029) identifies the strengthening of ESG standards as one of the key strategic directions.

Climate and environmental impact assessment

The Climate and environmental risk materiality assessment looks at the impact of physical and transition risks on the Bank’s activities, in terms of both financial and non-financial risks. The Climate and environmental risk materiality assessment and the Business environment scan are carried out at least once a year and approved by the Management Board of the Bank.

Use of Climate and environmental risk materiality assessment and the Business environment scan from a climate and environmental risk assessment perspective:

- part of the Group’s Self-Assessment (risk assessment) process (once a year);
- the results and findings of the Climate and environmental risk materiality assessment and the Business environment scan feed into the review of the Bank’s strategy (which also integrates ESG topics);
- they can also be used in the review of the Group’s Risk Management Strategy and Risk Appetite Statement;
- in other internal processes, such as determining the level of client ESG risk, stress testing, determining ESG risk indicators, etc.

In 2024, when Climate and environmental risk materiality assessment was carried out, it included a detailed assessment of the impact of physical and transition risks on the following risks: credit, market, liquidity, operational and reputational, compliance and strategic (business model) risks, as well as the main sectors and portfolios financed by the Bank. The assessment identified the main risk drivers, risk transmission channels, assessed the impact of risks over different time horizons (short-, medium and long-term), and determined the final level of risk after assessing the Bank’s risk management measures to mitigate these risks.

The Climate and environmental risk materiality assessment allows the Bank to get a holistic view and to direct its risk management strategy accordingly.

The impact of climate and environmental risks on the Bank’s standard financial and non-financial risks may vary from period to period. The Bank assesses the significance of climate and environmental risks by focusing on the following time periods:

<i>Period</i>	YEARS
<i>Short-term</i>	<1
<i>Medium</i>	1-5
<i>Long-term</i>	5-30

Following the identification of potential transition and physical risk drivers, their transmission channels, and the assessment of the measures taken by the Bank to mitigate these risks, the impact and materiality of these risks in the context of the Bank’s operations are further assessed. Although climate and environmental risks and their impact were assessed in the context of the Bank’s various financial and non-financial risks, material impacts were observed for the following risk categories: credit risk, reputational risk and strategic (business model) risk:

Climate and environmental risk category	Risk category	Impact	Time horizon	Material risks
<i>Transition risks</i>	Credit risk	The impact is considered to be negligible in this period due to the short time horizon and the likelihood of the risk drivers	Short-term	No

(All amounts are in EUR thousand, unless otherwise stated)

		occurring. In addition, the Bank has various risk management tools in place which are deemed sufficient to manage the risks arising in the short term.		
		The main impact in the medium and long term comes from the potential impact of transition risk on the Bank's clients, which arises from changing investor and client preferences, as well as from the changing regulatory environment, which creates the need to transform the business model for the Bank's clients. Impacts on the activities of the Bank's clients may affect their credit risk and the Bank's financial performance.	Medium	Yes
			Long-term	Yes
		The impact is considered to be negligible in this period due to the short time horizon and the likelihood of the risk drivers occurring, and the Bank has limited investments to highly polluting sectors.	Short-term	No
	Reputational risk	The impact of transition risk on the Bank's reputational risk has a tendency to increase in the medium to long term, depending on the measures taken by the Bank's clients to manage this risk, their ability to adapt to changes and the Bank's own ability to adequately manage the climate and environmental risks.	Medium	Yes
			Long-term	Yes
		The impact is considered to be negligible in this period due to the short time horizon and the likelihood of the risk drivers occurring, and the Bank's actions (strategic direction) are in line with current investor expectations.	Short-term	No
	Strategic (business model) risk	The impact is significant in the medium to long term due to the increasing focus on climate and environmental risk, both from the Bank's supervisors and due to the needs of investors and the Bank's clients.	Medium	Yes
			Long-term	Yes
Physical risks		The impact is considered to be negligible in this period due to relatively short time horizon and the likelihood of the risk drivers occurring. In addition, the Bank has various risk management tools in place, which are currently considered sufficient to manage the risks in the short term.	Short-term	No
		The impact of physical risks on the Bank's clients tends to be more pronounced in the longer term.	Medium	Yes
			Long-term	Yes
		Reputational risk	The impact is considered to be negligible in this period due to the short time horizon and the likelihood of the risk drivers occurring. In addition, the Bank has various risk management tools in place, which are currently	Short-term

(All amounts are in EUR thousand, unless otherwise stated)

	considered sufficient to manage the risks in the short term.		
	In the medium to long term, the impact of physical risk on the Bank's reputational risk has a tendency to increase due to the degree of uncertainty and potential impact of physical events on the Bank's clients and on the Bank's own ability to adequately manage the climate and environmental risks.	Medium	Yes
		Long-term	Yes
Strategic (business model) risk	The impact is considered to be negligible in this period due to the short time horizon and the likelihood of the risk drivers occurring. In addition, the Bank has various risk management tools in place, which are currently considered sufficient to manage the risks in the short term.	Short-term	No
		Medium	Yes
	The impact is significant in the medium to long term due to the increasing focus on climate and environmental risk, both from the Bank's supervisors and due to the needs of investors. Also due to the degree of uncertainty and potential impact of physical events on the Bank's clients and on the Bank's own ability to adequately manage the climate and environmental risks.	Long-term	Yes
Overall assessment	The impact in the short term is considered to be insignificant due to the relatively short time horizon, the likelihood of occurrence of the risk drivers and the measures taken by the Bank to manage these risks.	Short-term	No
		Medium	Yes
	In the medium to long term, the level of risk tends to increase mainly due to increasing regulatory requirements for both the Bank and its clients and the additional need for resources to meet new requirements, as well as the changing expectations and priorities of investors and clients focused on more sustainable solutions. The impacts on strategic and business risks in the longer term reflects the need to focus on climate and environmental risk management and the continuous improvement of the risk management framework.	Long-term	Yes

Transition risks

The materiality of transition risk drivers to credit risk is assessed both qualitatively by analysing the legal environment, best practices and international methodologies applied in the financial sector (e.g., the recommendations of the Task Force on Climate-Related Financial Disclosures, the reports of the European Banking Authority, the Fit for 55 toolkit and information on the related legislation). The materiality assessment also uses internal information, such as GHG emissions from financing activities, and takes into account the Bank's existing

methodology (e.g., sectors with high ESG risk) and the Bank's climate and environmental risk management measures. The impacts of transition risks are assessed for the largest sectors (real estate, construction, manufacturing, trade and transport, agriculture) and segments (retail clients and corporate clients) financed by the Bank over different time horizons: short-term (<1 year), medium (1-5 years) and long-term (5-30 years).

Following the update of the Climate and environmental risk materiality assessment in 2024 and taking into account the potential impacts of transition risks on individual sectors, the Bank has also updated the ESG Risk Assessment for Corporate Clients (methodology and process). The share of the Bank's corporate loan portfolio in sectors with high ESG risk (with a focus on transition risk) is relatively low (page 235). According to the methodology currently used, the Bank has identified the following sectors of economic activity where corporate clients may have the highest transition risk: agriculture, forestry and fishing, mining and quarrying; manufacturing; electricity, gas, steam and air conditioning supply; water supply, sewage treatment, waste management and remediation; and construction, transport and real estate affairs. The Bank operates in Lithuania and therefore the exposures presented in the table are limited to loans to business clients with operations in Lithuania.

Physical risks

In 2024, the Bank supplemented its earlier materiality assessment of physical risks with a more detailed and comprehensive materiality assessment of physical risks. The following physical risk categories and their impact on credit risk were assessed:

- Extreme weather events;
- Chronic weather events;
- Environmental physical risks – water scarcity, loss of biodiversity, impacts on soils (including soil degradation and erosion), destruction of habitats, dwindling resources, pollution.

Methodology

The Bank uses a variety of publicly available studies, tools and sources to assess the impact of physical risks. For example, the Study on Climate Change Risks by the Middle of the 21st Century (by the Hydrometeorological Service) and the Study of Soil Degradation and Erosion, Coastal Erosion and Solifluction in Lithuania (by Assoc. Prof. Dr. Jonas Volungevičius, Prof. Dr. Darius Veteikis and Dr. Laurynas Jukna), ThinkHazard!, Aqueduct tools. The analysis of environmental physical risks is based on policies and strategic plans of the European Union and Lithuania, as well as legislation and other sources. However, due to the lack of tools and sources, the analysis of environmental physical risks is of a more qualitative nature. Climate risk analysis (extreme and chronic weather events), on the other hand, is based on qualitative and quantitative approaches.

Scope of the assessment

The materiality assessment uses the Bank's internal information, such as information on collateral (pledged real estate – registered address of the property, value of collateral). This internal information is then combined with physical risk maps (e.g., a flood map) to determine the proportion of the Bank's collateral that is exposed to future flood risk. The Bank's climate and environmental risk management measures (e.g., monitoring of insurance conditions) are also taken into account when determining the final (residual) risk level. Flood risk is the most relevant physical climate risk identified. It affects a wide range of sectors in which real estate is used as collateral.

Climate risk impacts are assessed for the largest sectors (real estate affairs, manufacturing and trade), segments (retail clients and corporate clients) and products (mortgage loans, consumer loans, other loans) financed by the Bank.

The impacts of individual environmental risks are also assessed for other sectors financed by the Bank. Other environmental risks assessed include water scarcity, land use change, resource scarcity, biodiversity loss, destruction of habitats and pollution risks due to their environmental impacts in sectors such as agriculture, energy, manufacturing and construction. Land use change risks are relevant to the agriculture and construction sectors because of their potential impact on land and its characteristics. The water supply and waste recycling sectors, as well as the mining and quarrying sector, are exposed to resource scarcity and pollution risks. The impact assessment is carried out over different time horizons: short-term (<1 year), medium (1-5 years) and long-term (5-30 years).

Where possible, the Bank uses climate projections (Representative Concentration Pathways, or RCPs; Shared Socioeconomic Pathways, or SSPs) to better assess the impacts of climate change in the long term, or other available scenarios based on the source of information (e.g., realistic, optimistic and pessimistic scenarios). In other cases, qualitative expert judgement is used to determine how physical risk events may affect individual sectors or segments financed by the Bank, based on the sources mentioned above.

More information on transition and physical risks in the Šiaulių Bankas Group's 2024 Sustainability Report.

Memberships and Commitments

Partnership for Carbon Accounting Financials (PCAF). Recognizing that the majority of financial institutions' greenhouse gas (GHG) emissions and environmental impact originate from financing activities, the Bank joined the Partnership for Carbon Accounting Financials (PCAF) initiative at the beginning of 2023. The goal of this initiative is to help financial institutions measure and disclose GHG emissions from their financing and investment activities (Scope 3, Category 15 under the Greenhouse Gas (GHG) Protocol). The Bank selected the PCAF methodology due to its widespread recognition and applicability within the financial sector, as well as its alignment with the Bank's loan and securities portfolio data. Additionally, the PCAF methodology is based on the GHG Protocol, which the Bank follows when calculating its Scope 1 and 2 emissions, as well as other Scope 3 categories.

Science Based Targets initiative (SBTi). Bank as part of its commitment to actively contribute to climate change mitigation. The Bank has pledged to become climate-neutral by 2050 and to set near-term targets aligned with the trajectory for achieving the 2050 goals. By joining this initiative, the Bank has committed to defining targets and measures for reducing greenhouse gas (GHG) emissions within the next two years and ensuring their alignment with the SBTi standards.

The Bank will also seek to establish other important sustainability objectives in the environmental, social and governance areas.

Risk appetite

The Group periodically updates its Risk Management Strategy and Risk Appetite documents. The Risk Appetite Statement includes the following ESG risk indicators and their limits: the share of non-financed sectors, the share of high ESG risk in the loan portfolio and the staff turnover. To improve the Group's ESG risk assessment, other ESG risk indicators (which were previously monitored) were reviewed in 2024 and limits were set for some of them, for example, the taxonomy-aligned mortgage loan volume indicator was started to be monitored, and limits were set for other indicators in the social and governance areas. Other indicators in the environmental area continue to be monitored, such as the amount of fuel used in the Bank's official vehicles, the amount of taxonomy-eligible assets, the fulfilment of commitments to external investors, and the Bank's securities exposures that meet the ESG eligibility criteria.

Changes to the key ESG risk indicators of the Bank are considered by the Risk Committee and approved by the Supervisory Council, on the recommendation of the Bank's Management Board. Periodic monitoring of ESG risk

indicators and overall ESG risk management is carried out by the Risk Management Committee (reporting on a monthly basis) that reports periodically (quarterly) to the Risk Committee.

Limits are continuously monitored and controlled by the second line of defense and periodically reported to the Risk Management Committee (at the Bank Management Board level), the Bank Board and the Risk Committee (at the Supervisory Board level). In case of limit violations, the Bank has implemented ad-hoc escalation procedures to the Risk Committee and the Bank Management Board.

Stress testing

The Bank includes climate and environmental risk elements, i.e., exposures with a high/medium-high risk rating from the Climate and environmental risk materiality assessment, and the risk factors with the highest likelihood of occurrence and the highest potential impact, in the internal stress testing. The testing assesses the occurrence of climate risks under different scenarios, which are based on expert assumptions. The results of the stress tests are further used in the Bank's Internal Capital Adequacy Assessment Process (ICAAP) to ensure future capital adequacy.

The Bank plans to further develop and refine the climate and environmental risk scenarios for the stress tests and to compile the data needed for the tests, taking into account the information that is continuously accumulated on the main climate change risk drivers and their impact on the Bank's exposure to climate change risk.

Calculation of Financed GHG Emissions

To calculate financed greenhouse gas (GHG) emissions, the Bank uses GHG emissions data provided by clients or publicly available sources, such as corporate sustainability reports, Bloomberg, and CDP. In cases where direct emissions data is unavailable, emissions are estimated using the most recent financial data from clients (e.g., revenue, equity, liabilities). Additionally, the Bank relies on internal and third-party data sources (e.g., the State Enterprise Centre of Registers) to incorporate building energy efficiency ratings, floor space data, and manufacturer-reported GHG emissions for leased vehicles based on vehicle type and fuel type. In 2024, to comply with the Corporate Sustainability Reporting Directive (CSRD) and European Sustainability Reporting Standards (ESRS), the Bank has made significant efforts to enhance its emissions calculation methodology, collect more client-specific GHG emissions data, and, for the first time, disclose both direct operational and financed emissions at both the Bank and Group levels. Comprehensive details on the Bank's direct and financed GHG emissions can be found in the 2024 Šiaulių Bank Group Sustainability Report.

Financed GHG emissions are assessed once per year, meaning that the 2024 report presents emissions data for the 2024 reporting period. Scope 3 financed emissions (Column (j) of Template 1) are reported with limited coverage, focusing only on companies for which publicly available emissions data exists. The Bank maintains a cautious approach regarding Scope 3 emissions due to data reliability concerns. If emissions are not disclosed in corporate reports or public sources such as Bloomberg, the Bank avoids making speculative estimates. Looking ahead, the Bank aims to gradually expand its Scope 3 financed emissions assessment where feasible. To ensure greater accuracy in financed emissions calculations, the Bank is actively working to collect more direct emissions data from clients and enhance the reliability of other data sources used in calculations.

(All amounts are in EUR thousand, unless otherwise stated)

Template 1: Banking book - Climate Change transition risk: Credit quality of exposures by sector, emissions and residual maturity

Sector/subsector	a	b	c	d	e
	Gross carrying amount (M EUR)				
		Of which exposures towards companies excluded from EU Paris-aligned Benchmarks in accordance with points (d) to (g) of Article 12.1 and in accordance with Article 12.2 of Climate Benchmark Standards Regulation	Of which environmentally sustainable (CCM)	Of which stage 2 exposures	Of which non-performing exposures
1 Exposures towards sectors that highly contribute to climate change*	1565.76		1.75	137.13	43.96
2 A - Agriculture, forestry and fishing	52.28			7.4	0.64
3 B - Mining and quarrying	11.32			5.94	0
4 B.05 - Mining of coal and lignite	0	0		0	0
5 B.06 - Extraction of crude petroleum and natural gas	1.91	0		0	0
6 B.07 - Mining of metal ores	0			0	0
7 B.08 - Other mining and quarrying	9.41	0.08		5.94	0
8 B.09 - Mining support service activities	0	0		0	0
9 C - Manufacturing	276.95		0.34	19.26	21.74
10 C.10 - Manufacture of food products	38.29			0.66	17.57
11 C.11 - Manufacture of beverages	0.57			0.03	0
12 C.12 - Manufacture of tobacco products	0			0	0
13 C.13 - Manufacture of textiles	5.72			2.64	0
14 C.14 - Manufacture of wearing apparel	4.75			0.17	3.09
15 C.15 - Manufacture of leather and related products	0.65			0	0
16 C.16 - Manufacture of wood and of products of wood and cork, except furniture; manufacture of articles of straw and plaiting materials	69.2		0.32	1.3	0.03
17 C.17 - Manufacture of pulp, paper and paperboard	12.83			0	0
18 C.18 - Printing and service activities related to printing	4.62			2.35	0
19 C.19 - Manufacture of coke oven products	0	0		0	0
20 C.20 - Production of chemicals	8.04			0.02	0
21 C.21 - Manufacture of pharmaceutical preparations	0.01			0	0
22 C.22 - Manufacture of rubber products	7.92			1.03	0.52
23 C.23 - Manufacture of other non-metallic mineral products	4.33			0.49	0.11
24 C.24 - Manufacture of basic metals	0.09			0	0
25 C.25 - Manufacture of fabricated metal products, except machinery and equipment	35.95			0.19	0.36
26 C.26 - Manufacture of computer, electronic and optical products	1.96			0.02	0
27 C.27 - Manufacture of electrical equipment	4.96			0	0

(All amounts are in EUR thousand, unless otherwise stated)

28	<i>C.28 - Manufacture of machinery and equipment n.e.c.</i>	4.87			0.21	0
29	<i>C.29 - Manufacture of motor vehicles, trailers and semi-trailers</i>	0.55			0	0
30	<i>C.30 - Manufacture of other transport equipment</i>	4.96		0.02	0.09	0
31	<i>C.31 - Manufacture of furniture</i>	48.89			0.32	0.04
32	<i>C.32 - Other manufacturing</i>	6.91			0.03	0.02
33	<i>C.33 - Repair and installation of machinery and equipment</i>	10.9			9.7	0
34	D - Electricity, gas, steam and air conditioning supply	124.35		1.41	8.58	5.44
35	<i>D35.1 - Electric power generation, transmission and distribution</i>	86.03			6.48	4.71
36	<i>D35.11 - Production of electricity</i>	70.98			6.48	4.71
37	<i>D35.2 - Manufacture of gas; distribution of gaseous fuels through mains</i>	0.56	0.56		0.4	0.06
38	<i>D35.3 - Steam and air conditioning supply</i>	37.76			1.7	0.67
39	E - Water supply; sewerage, waste management and remediation activities	28.78			0.84	1.13
40	F - Construction	171.52			25.42	1.86
41	<i>F.41 - Construction of buildings</i>	138.44			24.54	0.65
42	<i>F.42 - Civil engineering</i>	14.39			0.17	0.66
43	<i>F.43 - Specialised construction activities</i>	18.7			0.71	0.55
44	G - Wholesale and retail trade; repair of motor vehicles and motorcycles	197.66	28.45		15.84	2.23
45	H - Transportation and storage	101.89	0		6.2	0.38
46	<i>H.49 - Land transport and transport via pipelines</i>	48.86			4.62	0.25
47	<i>H.50 - Water transport</i>	0.12			0.01	0
48	<i>H.51 - Air transport</i>	0.01			0	0
49	<i>H.52 - Warehousing and support activities for transportation</i>	52.91			1.57	0.12
50	<i>H.53 - Postal and courier activities</i>	0			0	0
51	I - Accommodation and food service activities	69.34			8.48	0.03
52	L - Real estate activities	531.67			39.16	10.52
53	Exposures towards sectors other than those that highly contribute to climate change*	321.86		1.84	9.23	3.55
54	K - Financial and insurance activities	2.34		0.22	0.01	0.01
55	Exposures to other sectors (NACE codes J, M - U)	319.52		1.62	9.22	3.54
56	TOTAL	1887.62	29.1	3.59	146.36	47.51

(continued)

Sector/subsector	f	g	h
	Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions (M EUR)		
		Of which Stage 2 exposures	Of which non-performing exposures
1 Exposures towards sectors that highly contribute to climate change*	-24.06	-1.1	-9.8
2 A - Agriculture, forestry and fishing	-0.25	-0.03	-0.05
3 B - Mining and quarrying	-0.06	-0.06	0
4 <i>B.05 - Mining of coal and lignite</i>	0	0	0
5 <i>B.06 - Extraction of crude petroleum and natural gas</i>	0	0	0
6 <i>B.07 - Mining of metal ores</i>	0	0	0

(All amounts are in EUR thousand, unless otherwise stated)

7	<i>B.08 - Other mining and quarrying</i>	-0.06	-0.06	0
8	<i>B.09 - Mining support service activities</i>	0	0	0
9	C - Manufacturing	-5.04	-0.09	-3.89
10	<i>C.10 - Manufacture of food products</i>	-3.27	-0.02	-3.21
11	<i>C.11 - Manufacture of beverages</i>	0	0	0
12	<i>C.12 - Manufacture of tobacco products</i>	0	0	0
13	<i>C.13 - Manufacture of textiles</i>	-0.03	-0.02	0
14	<i>C.14 - Manufacture of wearing apparel</i>	-0.18	0	-0.18
15	<i>C.15 - Manufacture of leather and related products</i>	0	0	0
16	<i>C.16 - Manufacture of wood and of products of wood and cork, except furniture; manufacture of articles of straw and plaiting materials</i>	-0.42	-0.01	-0.03
17	<i>C.17 - Manufacture of pulp, paper and paperboard</i>	-0.03	0	0
18	<i>C.18 - Printing and service activities related to printing</i>	-0.01	-0.01	0
19	<i>C.19 - Manufacture of coke oven products</i>	0	0	0
20	<i>C.20 - Production of chemicals</i>	-0.02	0	0
21	<i>C.21 - Manufacture of pharmaceutical preparations</i>	0	0	0
22	<i>C.22 - Manufacture of rubber products</i>	-0.41	-0.01	-0.35
23	<i>C.23 - Manufacture of other non-metallic mineral products</i>	-0.11	-0.01	-0.1
24	<i>C.24 - Manufacture of basic metals</i>	0	0	0
25	<i>C.25 - Manufacture of fabricated metal products, except machinery and equipment</i>	-0.37	-0.01	-0.01
26	<i>C.26 - Manufacture of computer, electronic and optical products</i>	-0.01	0	0
27	<i>C.27 - Manufacture of electrical equipment</i>	0	0	0
28	<i>C.28 - Manufacture of machinery and equipment n.e.c.</i>	-0.02	0	0
29	<i>C.29 - Manufacture of motor vehicles, trailers and semi-trailers</i>	0	0	0
30	<i>C.30 - Manufacture of other transport equipment</i>	0	0	0
31	<i>C.31 - Manufacture of furniture</i>	-0.14	0	0
32	<i>C.32 - Other manufacturing</i>	-0.02	0	-0.01
33	<i>C.33 - Repair and installation of machinery and equipment</i>	-0.01	0	0
34	D - Electricity, gas, steam and air conditioning supply	-2.98	-0.03	-1.25
35	<i>D35.1 - Electric power generation, transmission and distribution</i>	-2.48	-0.02	-1.09
36	<i>D35.11 - Production of electricity</i>	-2.39	-0.02	-1.08
37	<i>D35.2 - Manufacture of gas; distribution of gaseous fuels through mains</i>	-0.05	0	-0.05
38	<i>D35.3 - Steam and air conditioning supply</i>	-0.44	-0.01	-0.11
39	E - Water supply; sewerage, waste management and remediation activities	-0.32	-0.01	-0.18
40	F - Construction	-5.41	-0.33	-0.66
41	<i>F.41 - Construction of buildings</i>	-4.84	-0.26	-0.38
42	<i>F.42 - Civil engineering</i>	-0.12	-0.01	-0.06
43	<i>F.43 - Specialised construction activities</i>	-0.45	-0.07	-0.22
44	G - Wholesale and retail trade; repair of motor vehicles and motorcycles	-1.42	-0.11	-0.57
45	H - Transportation and storage	-0.92	-0.22	-0.17
46	<i>H.49 - Land transport and transport via pipelines</i>	-0.56	-0.2	-0.14
47	<i>H.50 - Water transport</i>	0	0	0
48	<i>H.51 - Air transport</i>	0	0	0
49	<i>H.52 - Warehousing and support activities for transportation</i>	-0.36	-0.02	-0.03
50	<i>H.53 - Postal and courier activities</i>	0	0	0
51	I - Accommodation and food service activities	-0.15	-0.03	0
52	L - Real estate activities	-7.5	-0.19	-3.03
53	Exposures towards sectors other than those that highly contribute to climate change*	-7.5	-0.22	-0.98

(All amounts are in EUR thousand, unless otherwise stated)

54	K - Financial and insurance activities	-0.02	0	0
55	Exposures to other sectors (NACE codes J, M - U)	-7.48	-0.22	-0.98
56	TOTAL	-31.56	-1.32	-10.78

(continued)

Sector/subsector	i	j	k	l	m	n	o	p
	GHG financed emissions (scope 1, scope 2 and scope 3 emissions of the counterparty) (in tons of CO2 equivalent)	Of which Scope 3 financed emissions	GHG emissions (column i): gross carrying amount percentage of the portfolio derived from company-specific reporting	<= 5 years	> 5 year <= 10 years	> 10 year <= 20 years	> 20 years	Average weighted maturity
1 Exposures towards sectors that highly contribute to climate change*	283438.8	22356.6		1406.77	63.77	95.12	0.1	3.95
2 A - Agriculture, forestry and fishing	42511.82	0		40	12.28	0	0	3.81
3 B - Mining and quarrying	12741.84	244.76		11.32	0	0	0	4.47
4 B.05 - Mining of coal and lignite	0	0		0	0	0	0	0
5 B.06 - Extraction of crude petroleum and natural gas	604.09	244.76	0.20342	1.91	0	0	0	1.75
6 B.07 - Mining of metal ores	0	0		0	0	0	0	0
7 B.08 - Other mining and quarrying	12137.75	0		9.41	0	0	0	2.72
8 B.09 - Mining support service activities	0	0		0	0	0	0	0
9 C - Manufacturing	56050.15	10543.58		257.42	19.53	0	0	2.16
10 C.10 - Manufacture of food products	7710.29	97.21	0.01300	35.77	2.53	0	0	1.56
11 C.11 - Manufacture of beverages	61.57	0		0.54	0.03	0	0	3.04
12 C.12 - Manufacture of tobacco products	0	0		0	0	0	0	0
13 C.13 - Manufacture of textiles	1180.94	0		5.72	0	0	0	1.81
14 C.14 - Manufacture of wearing apparel	865.43	0		4.75	0	0	0	1.14
15 C.15 - Manufacture of leather and related products	113.13	0		0.65	0	0	0	2.62
16 C.16 - Manufacture of wood and of products of wood and cork, except furniture; manufacture of articles of straw and plaiting materials	18887.04	805.87	0.02900	69.05	0.15	0	0	2.88
17 C.17 - Manufacture of pulp, paper and paperboard	1281.04	0		11.81	1.02	0	0	3.36
18 C.18 - Printing and service activities related to printing	521.53	0		4.62	0	0	0	2.48
19 C.19 - Manufacture of coke oven products	0	0		0	0	0	0	0
20 C.20 - Production of chemicals	2012.24	0	0.25100	8.04	0	0	0	0.95
21 C.21 - Manufacture of pharmaceutical preparations	2.4	0		0.01	0	0	0	0.25
22 C.22 - Manufacture of rubber products	4136.66	0		7.92	0	0	0	3.5
23 C.23 - Manufacture of other non-metallic mineral products	562.13	0		4.29	0.03	0	0	1.82
24 C.24 - Manufacture of basic metals	23.18	0		0.09	0	0	0	1.52
25 C.25 - Manufacture of fabricated metal products, except machinery and equipment	4406.34	0		35.16	0.8	0	0	2.23

(All amounts are in EUR thousand, unless otherwise stated)

26	<i>C.26 - Manufacture of computer, electronic and optical products</i>	92.55	0		0.49	1.47	0	0	4.84
27	<i>C.27 - Manufacture of electrical equipment</i>	549.56	13.65	0.89400	4.28	0.68	0	0	3.17
28	<i>C.28 - Manufacture of machinery and equipment n.e.c.</i>	259.15	0		4.83	0.05	0	0	2.71
29	<i>C.29 - Manufacture of motor vehicles, trailers and semi-trailers</i>	15.77	0		0.55	0	0	0	2.72
30	<i>C.30 - Manufacture of other transport equipment</i>	7981.65	7833	0.81700	4.96	0	0	0	1
31	<i>C.31 - Manufacture of furniture</i>	4680.63	1793.85	0.05800	36.1	12.79	0	0	4.48
32	<i>C.32 - Other manufacturing</i>	311.99	0		6.91	0	0	0	2.74
33	<i>C.33 - Repair and installation of machinery and equipment</i>	394.93	0		10.9	0	0	0	0.49
34	<i>D - Electricity, gas, steam and air conditioning supply</i>	31812.59	8752.14		94.55	6.47	23.32	0	6.86
35	<i>D35.1 - Electric power generation, transmission and distribution</i>	9255.28	2823.42	0.20700	85.19	0.84	0	0	3.28
36	<i>D35.11 - Production of electricity</i>	4415.92	0		70.14	0.84	0	0	3.44
37	<i>D35.2 - Manufacture of gas; distribution of gaseous fuels through mains</i>	6.33	0		0.56	0	0	0	2.3
38	<i>D35.3 - Steam and air conditioning supply</i>	22550.98	5928.72		8.81	5.63	23.32	0	12.27
39	<i>E - Water supply; sewerage, waste management and remediation activities</i>	4067.16	0	0.00001	14.09	2.12	12.56	0	8.84
40	<i>F - Construction</i>	10596.84	0		169.3	0.54	1.68	0.01	2.99
41	<i>F.41 - Construction of buildings</i>	7136.67	0		137.99	0.31	0.14	0	2.38
42	<i>F.42 - Civil engineering</i>	1927.82	0		14.39	0	0	0	2.76
43	<i>F.43 - Specialised construction activities</i>	1532.35	0		16.92	0.23	1.55	0	3.67
44	<i>G - Wholesale and retail trade; repair of motor vehicles and motorcycles</i>	70079.06	176.15	0.00300	195.86	1.72	0	0.09	1.94
45	<i>H - Transportation and storage</i>	40879.07	2192.43		101.38	0.51	0	0	3.04
46	<i>H.49 - Land transport and transport via pipelines</i>	30156.08	2192.43	0.15100	48.4	0.46	0	0	2.49
47	<i>H.50 - Water transport</i>	9.07	0		0.12	0	0	0	2.22
48	<i>H.51 - Air transport</i>	0.55	0		0.01	0	0	0	2.3
49	<i>H.52 - Warehousing and support activities for transportation</i>	10712.5	0		52.85	0.06	0	0	2.96
50	<i>H.53 - Postal and courier activities</i>	0.87	0		0	0	0	0	0.82
51	<i>I - Accommodation and food service activities</i>	1951.88	338.49	0.02000	69.15	0.18	0	0	3.41
52	<i>L - Real estate activities</i>	12748.39	109.05	0.00050	453.7	20.42	57.55	0	4.61
53	Exposures towards sectors other than those that highly contribute to climate change*				283.6	3.74	34.11	0.42	4.37
54	<i>K - Financial and insurance activities</i>				2.34	0	0	0	2.05
55	Exposures to other sectors (NACE codes J, M - U)				281.26	3.74	34.11	0.42	4.17
56	TOTAL	283438.8	22356.6	0.02365	1690.37	67.51	129.22	0.52	4.03

* In accordance with the Commission delegated regulation EU) 2020/1818 supplementing regulation (EU) 2016/1011 as regards minimum standards for EU Climate Transition Benchmarks and EU Paris-aligned Benchmarks -Climate Benchmark Standards Regulation - Recital 6: Sectors listed in Sections A to H and Section L of Annex I to Regulation (EC) No 1893/2006.

Of which exposures towards companies excluded from EU Paris-aligned Benchmarks in accordance with points (d) to (g) of Article 12.1 and in accordance with Article 12.2 of Climate Benchmark Standards Regulation part contains information on positions if they fall into these sectors: B.05, B.06, B.08.92, B.09.1, C.19, D.35.2, G.46.71, G.47.3, H.49.5.

(All amounts are in EUR thousand, unless otherwise stated)

Template 2: Banking book - Climate change transition risk: Loans collateralised by immovable property -
Energy efficiency of the collateral

	Counterparty sector	Total gross carrying amount (in M EUR)						
		Level of energy efficiency (EP score in kWh/m ² of collateral)						
		0; <= 100	> 100; <= 200	> 200; <= 300	> 300; <= 400	> 400; <= 500	> 500	
1	Total EU area	2129.97	1057.67	104.79	40.22	17.27	10.48	28.22
2	Of which Loans collateralised by commercial immovable property	1241.19	539.28	46.39	26.2	7.04	2.76	4.95
3	Of which Loans collateralised by residential immovable property	888.78	518.39	58.39	14.02	10.23	7.73	23.28
4	Of which Collateral obtained by taking possession: residential and commercial immovable properties							
5	Of which Level of energy efficiency (EP score in kWh/m ² of collateral) estimated	0	0	0	0	0	0	0
6	Total non-EU area	0	0	0	0	0	0	0
7	Of which Loans collateralised by commercial immovable property	0	0	0	0	0	0	0
8	Of which Loans collateralised by residential immovable property	0	0	0	0	0	0	0
9	Of which Collateral obtained by taking possession: residential and commercial immovable properties							
10	Of which Level of energy efficiency (EP score in kWh/m ² of collateral) estimated	0	0	0	0	0	0	0

(continued)

	Counterparty sector	h	i	j	k	l	m	n	o	p	
		Total gross carrying amount (in MEUR)								Without EPC label of collateral	Of which level of energy efficiency (EP score in kWh/m ² of collateral) estimated
		Level of energy efficiency (EPC label of collateral)									
		A	B	C	D	E	F	G			
1	Total EU area	490.95	309.66	101.84	85.43	35.84	81.95	152.97	871.33		
2	Of which Loans collateralised by commercial immovable property	235.84	190.7	62.02	56.75	26.49	41.59	13.21	614.58		
3	Of which Loans collateralised by residential immovable property	255.11	118.96	39.82	28.68	9.35	40.35	139.77	256.75		
4	Of which Collateral obtained by taking possession: residential and commercial immovable properties										
5	Of which Level of energy efficiency (EP score in kWh/m ² of collateral) estimated										
6	Total non-EU area	0	0	0	0	0	0	0	0		
7	Of which Loans collateralised by commercial immovable property	0	0	0	0	0	0	0	0		

8	Of which Loans collateralised by residential immovable property	0	0	0	0	0	0	0	0
9	Of which Collateral obtained by taking possession: residential and commercial immovable properties								
10	Of which Level of energy efficiency (EP score in kWh/m ² of collateral) estimated								

Template 3: Banking book. Indicators of potential climate change-related transition risks. Alignment parameters²

	a	b	c	d	e	f	g
	Sector	NACE Sectors (a minima)	Portfolio gross carrying amount (Mn EUR)	Alignment metric**	Year of reference	Distance to IEA NZE2050 in % ***	Target (year of reference + 3 years)
1	Power	351	86.57	grams of CO ₂ per kWh of power produced (Scope 1 & 2)			
2	Fossil fuel combustion	3521	13.16	financed emissions (Scope 1 & 2 & 3 use of sold products)			
3	Automotive	29	6.99	grams of CO ₂ per kilometer (Scope 3 use of sold products TtW)			
4	Aviation	51	0.06	N/A			
5	Maritime transport	50	0.7	grams of CO ₂ per tonne.nautical mile (Scope 1 & 3 fuel and energy)			
6	Cement, clinker and lime production	2363	6.99	N/A			
7	Iron and steel, coke, and metal ore production	2511	20.72	tonnes of CO ₂ per tonne of steel (Scope 1 & 2)			
8	Chemicals	22	0	N/A			
9	... potential additions relevant to the business model of the institution		0	N/A			

*** Point in Time (PiT) distance to 2030 NZE2050 scenario in % (for each metric)

² Update date 28-10-2025.

(All amounts are in EUR thousand, unless otherwise stated)

* List of NACE sectors to be considered

IEA sector	Column b - NACE Sectors (a minima) - Sectors required		**Examples of metrics - non-exhaustive list. Institutions shall apply metrics defined by the IEA scenario
<i>Sector in the template</i>	<i>sector</i>	<i>code</i>	
<i>Maritime transport</i>	<i>shipping</i>	<i>301</i>	Average tonnes of CO2 per passenger-km Average gCO ₂ /MJ and Average share of high carbon technologies (ICE).
<i>Maritime transport</i>	<i>shipping</i>	<i>3011</i>	
<i>Maritime transport</i>	<i>shipping</i>	<i>3012</i>	
<i>Maritime transport</i>	<i>shipping</i>	<i>3315</i>	
<i>Maritime transport</i>	<i>shipping</i>	<i>50</i>	
<i>Maritime transport</i>	<i>shipping</i>	<i>501</i>	
<i>Maritime transport</i>	<i>shipping</i>	<i>5010</i>	
<i>Maritime transport</i>	<i>shipping</i>	<i>502</i>	
<i>Maritime transport</i>	<i>shipping</i>	<i>5020</i>	
<i>Maritime transport</i>	<i>shipping</i>	<i>5222</i>	
<i>Maritime transport</i>	<i>shipping</i>	<i>5224</i>	
<i>Maritime transport</i>	<i>shipping</i>	<i>5229</i>	
<i>Power</i>	<i>power</i>	<i>27</i>	Average tonnes of CO2 per MWh and Average share of high carbon technologies (oil, gas, coal).
<i>Power</i>	<i>power</i>	<i>2712</i>	
<i>Power</i>	<i>power</i>	<i>3314</i>	
<i>Power</i>	<i>power</i>	<i>35</i>	
<i>Power</i>	<i>power</i>	<i>351</i>	
<i>Power</i>	<i>power</i>	<i>3511</i>	
<i>Power</i>	<i>power</i>	<i>3512</i>	
<i>Power</i>	<i>power</i>	<i>3513</i>	
<i>Power</i>	<i>power</i>	<i>3514</i>	
<i>Power</i>	<i>power</i>	<i>4321</i>	
<i>Fossil fuel combustion</i>	<i>oil and gas</i>	<i>91</i>	Average tons pf CO2 per GJ. and Average share of high carbon technologies (ICE).
<i>Fossil fuel combustion</i>	<i>oil and gas</i>	<i>910</i>	
<i>Fossil fuel combustion</i>	<i>oil and gas</i>	<i>192</i>	
<i>Fossil fuel combustion</i>	<i>oil and gas</i>	<i>1920</i>	
<i>Fossil fuel combustion</i>	<i>oil and gas</i>	<i>2014</i>	
<i>Fossil fuel combustion</i>	<i>oil and gas</i>	<i>352</i>	
<i>Fossil fuel combustion</i>	<i>oil and gas</i>	<i>3521</i>	
<i>Fossil fuel combustion</i>	<i>oil and gas</i>	<i>3522</i>	
<i>Fossil fuel combustion</i>	<i>oil and gas</i>	<i>3523</i>	
<i>Fossil fuel combustion</i>	<i>oil and gas</i>	<i>4612</i>	
<i>Fossil fuel combustion</i>	<i>oil and gas</i>	<i>4671</i>	
<i>Fossil fuel combustion</i>	<i>oil and gas</i>	<i>6</i>	
<i>Fossil fuel combustion</i>	<i>oil and gas</i>	<i>61</i>	
<i>Fossil fuel combustion</i>	<i>oil and gas</i>	<i>610</i>	
<i>Fossil fuel combustion</i>	<i>oil and gas</i>	<i>62</i>	

(All amounts are in EUR thousand, unless otherwise stated)

<i>Fossil fuel combustion</i>	<i>oil and gas</i>	620	
<i>Iron and steel, coke, and metal ore production</i>	<i>steel</i>	24	Average tonnes of CO2 per tonne of output and Average share of high carbon technologies (ICE).
<i>Iron and steel, coke, and metal ore production</i>	<i>steel</i>	241	
<i>Iron and steel, coke, and metal ore production</i>	<i>steel</i>	2410	
<i>Iron and steel, coke, and metal ore production</i>	<i>steel</i>	242	
<i>Iron and steel, coke, and metal ore production</i>	<i>steel</i>	2420	
<i>Iron and steel, coke, and metal ore production</i>	<i>steel</i>	2434	
<i>Iron and steel, coke, and metal ore production</i>	<i>steel</i>	244	
<i>Iron and steel, coke, and metal ore production</i>	<i>steel</i>	2442	
<i>Iron and steel, coke, and metal ore production</i>	<i>steel</i>	2444	
<i>Iron and steel, coke, and metal ore production</i>	<i>steel</i>	2445	
<i>Iron and steel, coke, and metal ore production</i>	<i>steel</i>	245	
<i>Iron and steel, coke, and metal ore production</i>	<i>steel</i>	2451	
<i>Iron and steel, coke, and metal ore production</i>	<i>steel</i>	2452	
<i>Iron and steel, coke, and metal ore production</i>	<i>steel</i>	25	
<i>Iron and steel, coke, and metal ore production</i>	<i>steel</i>	251	
<i>Iron and steel, coke, and metal ore production</i>	<i>steel</i>	2511	
<i>Iron and steel, coke, and metal ore production</i>	<i>steel</i>	4672	
<i>Iron and steel, coke, and metal ore production</i>	<i>coal</i>	5	
<i>Iron and steel, coke, and metal ore production</i>	<i>coal</i>	51	
<i>Iron and steel, coke, and metal ore production</i>	<i>coal</i>	510	
<i>Iron and steel, coke, and metal ore production</i>	<i>coal</i>	52	
<i>Iron and steel, coke, and metal ore production</i>	<i>coal</i>	520	
<i>Iron and steel, coke, and metal ore production</i>	<i>steel</i>	7	
<i>Iron and steel, coke, and metal ore production</i>	<i>steel</i>	72	
<i>Iron and steel, coke, and metal ore production</i>	<i>steel</i>	729	
<i>Fossil fuel combustion</i>	<i>coal</i>	8	Average tons of CO2 per GJ. and Average share of high carbon technologies (ICE).
<i>Fossil fuel combustion</i>	<i>coal</i>	9	
<i>Cement, clinker and lime production</i>	<i>cement</i>	235	Average tonnes of CO2 per tonne of output and Average share of high carbon technologies (ICE).
<i>Cement, clinker and lime production</i>	<i>cement</i>	2351	
<i>Cement, clinker and lime production</i>	<i>cement</i>	2352	
<i>Cement, clinker and lime production</i>	<i>cement</i>	236	
<i>Cement, clinker and lime production</i>	<i>cement</i>	2361	
<i>Cement, clinker and lime production</i>	<i>cement</i>	2363	
<i>Cement, clinker and lime production</i>	<i>cement</i>	2364	
<i>Cement, clinker and lime production</i>	<i>cement</i>	811	
<i>Cement, clinker and lime production</i>	<i>cement</i>	89	
<i>aviation</i>	<i>aviation</i>	3030	Average share of sustainable aviation fuels and Average tonnes of CO2 per passenger-km
<i>aviation</i>	<i>aviation</i>	3316	
<i>aviation</i>	<i>aviation</i>	511	
<i>aviation</i>	<i>aviation</i>	5110	
<i>aviation</i>	<i>aviation</i>	512	

<i>aviation</i>	<i>aviation</i>	5121	Average tonnes of CO2 per passenger-km and Average share of high carbon technologies (ICE).
<i>aviation</i>	<i>aviation</i>	5223	
<i>automotive</i>	<i>automotive</i>	2815	
<i>automotive</i>	<i>automotive</i>	29	
<i>automotive</i>	<i>automotive</i>	291	
<i>automotive</i>	<i>automotive</i>	2910	
<i>automotive</i>	<i>automotive</i>	292	
<i>automotive</i>	<i>automotive</i>	2920	
<i>automotive</i>	<i>automotive</i>	293	
<i>automotive</i>	<i>automotive</i>	2932	

The Bank, in order to actively contribute to the goal of reducing climate change, in January of 2024 became a part of the international Science Based Targets initiative (SBTi) and committed to becoming a climate-neutral bank by 2050. The Bank plans to set near-term goals aligned with 2050 trajectory of goal implementation. By joining this initiative, the Bank undertakes to set goals and measures for the reduction of greenhouse gases and harmonize them with the standard of the SBTi initiative within the next two years, so the rest of the information about the harmonization parameters (template 3 (d) - (g) columns) is planned to be disclosed by the Bank's Risks and capital management report for 2025.

Template 4: Banking book - Climate change transition risk: Exposures to top 20 carbon-intensive firms

	a	b	c	d	e
	Gross carrying amount (aggregate)	Gross carrying amount towards the counterparties compared to total gross carrying amount (aggregate)*	Of which environmentally sustainable (CCM)	Weighted average maturity	Number of top 20 polluting firms included
1	0	0	0	0	0

* For counterparties among the top 20 carbon emitting companies in the world

At the end of 2024, the Bank had no exposures to the top 20 most polluting companies. Data about Top 20 most polluting firms in the world, with reference year 2023, was sourced from: The 20 most polluting companies in the world - The Corporate Governance Institute, Carbon Majors Database and Climate Accountability Institute.

Template 5: Banking book - Climate change physical risk: Exposures subject to physical risk

	a	b	c	d	e	f	g
Variable: Geographical area subject to climate change physical risk - acute and chronic events		Gross carrying amount (M EUR)					Average weighted maturity
		of which exposures sensitive to impact from climate change physical events					
		Breakdown by maturity bucket					
		<= 5 years	> 5 year <= 10 years	> 10 year <= 20 years	> 20 years		
1	A - Agriculture, forestry and fishing	52.28	2.65	-	-	-	1.65
2	B - Mining and quarrying	11.32	5.94	-	-	-	3.32
3	C - Manufacturing	276.95	44.28	3.99	-	-	2.31
4	D - Electricity, gas, steam and air conditioning supply	124.34	15.98	-	-	-	2.14
5	E - Water supply; sewerage, waste management and remediation activities	28.77	6.77	-	-	-	1.76

(All amounts are in EUR thousand, unless otherwise stated)

6	F - Construction	171.52	45.62	-	-	-	2.47
7	G - Wholesale and retail trade; repair of motor vehicles and motorcycles	197.66	75.34	0.85	-	-	2.27
8	H - Transportation and storage	101.89	10.21	-	-	-	2.29
9	L - Real estate activities	531.67	119.24	5.54	-	-	3.30
10	Loans collateralised by residential immovable property	240.56	137.49	-	-	-	3.05
11	Loans collateralised by commercial immovable property	1,241.19	423.68	11.50	-	-	2.95
12	Repossessed collaterals	-	-	-	-	-	-
13	Other relevant sectors (breakdown below where relevant)	-	-	-	-	-	-

(continued)

a	h	i	j	k	l	m	n	o
Variable: Geographical area subject to climate change physical risk - acute and chronic events A - Agriculture, forestry and fishing	Gross carrying amount (M EUR)							
	of which exposures sensitive to impact from climate change physical events							
	of which exposures sensitive to impact from chronic climate change events	of which exposures sensitive to impact from acute climate change events	of which exposures sensitive to impact both from chronic and acute climate change events	Of which Stage 2 exposures	Of which non-performing exposures	Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions		
						of which Stage 2 exposures	Of which non-performing exposures	
1 B - Mining and quarrying	-	2.65	2.65	2.48	-	-0.01	-0.01	-
2 C - Manufacturing	-	5.94	5.94	5.94	-	-0.05	-0.05	-
3 D - Electricity, gas, steam and air conditioning supply	-	48.27	48.27	2.84	4.48	-0.61	-0.02	-0.37
4 E - Water supply; sewerage, waste management and remediation activities	-	15.99	15.99	4.25	4.68	-0.63	-0.00	-0.54
5 F - Construction	-	6.77	6.77	-	-	-0.01	-	-
6 G - Wholesale and retail trade; repair of motor vehicles and motorcycles	-	45.62	45.62	0.01	0.58	-0.64	-0.00	-0.03
7 H - Transportation and storage	-	76.19	76.19	0.17	0.08	-0.52	-0.00	-0.00
8 L - Real estate activities	-	10.21	10.21	0.14	-	-0.01	-0.00	-
9 Loans collateralised by residential immovable property	-	124.79	124.79	8.50	-	-0.82	-0.01	-
10 Loans collateralised by commercial immovable property	-	137.49	137.49	0.26	0.37	-0.60	-0.00	-0.03
11 Repossessed collaterals	-	435.18	435.18	24.38	8.54	-3.16	-0.10	-0.73
12 Other relevant sectors (breakdown below where relevant)	-	-	-	-	-	-	-	-
13 Variable: Geographical area subject to climate change physical risk - acute and chronic events	-	-	-	-	-	-	-	-

In 2024, the Bank enhanced its physical risk materiality assessment, identifying flood risk as the most relevant physical climate risk. When assessing positions related to physical risks, the Bank identifies loans secured by real estate that are exposed to chronic and/or acute climate-related hazards. The report presents positions classified as high risk level - flooding risk, based on assessments at the county and district levels within the country.

Template 6. Summary of GAR KPIs

	KPI			% coverage (over total assets)*
	Climate change mitigation	Climate change adaptation	Total (Climate change mitigation + Climate change adaptation)	
GAR stock	1.48%	0.10%	1.58%	76.06%
GAR flow	7.02%	0.00%	7.02%	5.89%

* % of assets covered by the KPI over banks' total assets

Template 7 - Mitigating actions: Assets for the calculation of GAR

		a	b	c	d	e	f
Million EUR		Disclosure reference date 31-12-2024					
		Climate Change Mitigation (CCM)					
		Of which towards taxonomy relevant sectors (Taxonomy-eligible)					
		Of which environmentally sustainable (Taxonomy-aligned)					
		Total gross carrying amount			Of which specialised lending	Of which transitional	Of which enabling
GAR - Covered assets in both numerator and denominator							
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	1639.44	908.00	53.21	0.00	0.00	0.00
2	Financial corporations	174.01	1.03	0.22	0.00	0.00	0.00
3	Credit institutions	8.98	0.00	0.00	0.00	0.00	0.00
4	Loans and advances	4.46	0.00	0.00	0.00	0.00	0.00
5	Debt securities, including UoP	2.43	0.00	0.00	0.00	0.00	0.00
6	Equity instruments	2.09	0.00	0.00		0.00	0.00
7	Other financial corporations	165.03	1.03	0.22	0.00	0.00	0.00
8	of which investment firms	165.03	0.00	0.00	0.00	0.00	0.00
9	Loans and advances	152.71	0.00	0.00	0.00	0.00	0.00
10	Debt securities, including UoP	11.88	1.03	0.22	0.00	0.00	0.00
11	Equity instruments	0.44	0.00	0.00		0.00	0.00
12	of which management companies	0.00	0.00	0.00	0.00	0.00	0.00
13	Loans and advances	0.00	0.00	0.00	0.00	0.00	0.00
14	Debt securities, including UoP	0.00	0.00	0.00	0.00	0.00	0.00
15	Equity instruments	0.00	0.00	0.00		0.00	0.00
16	of which insurance undertakings	0.00	0.00	0.00	0.00	0.00	0.00
17	Loans and advances	0.00	0.00	0.00	0.00	0.00	0.00
18	Debt securities, including UoP	0.00	0.00	0.00	0.00	0.00	0.00
19	Equity instruments	0.00	0.00	0.00		0.00	0.00
20	Non-financial corporations (subject to NFRD disclosure obligations)	13.67	7.29	3.37	0.00	0.00	0.00
21	Loans and advances	0.00	0.00	0.00	0.00	0.00	0.00
22	Debt securities, including UoP	13.32	7.29	3.37	0.00	0.00	0.00
23	Equity instruments	0.35	0.00	0.00		0.00	0.00
24	Households	1413.79	899.68	49.62	0.00	0.00	0.00
25	of which loans collateralised by residential immovable property	886.38	886.38	49.62	0.00	0.00	0.00

(All amounts are in EUR thousand, unless otherwise stated)

26	of which building renovation loans	81.09	10.31	0.00	0.00	0.00	0.00
27	of which motor vehicle loans	45.10	2.99	0.00	0.00	0.00	0.00
28	Local governments financing	37.97	0.00	0.00	0.00	0.00	0.00
29	Housing financing	0.00	0.00	0.00	0.00	0.00	0.00
30	Other local governments financing	37.97	0.00	0.00	0.00	0.00	0.00
31	Collateral obtained by taking possession: residential and commercial immovable properties	0.00	0.00	0.00	0.00	0.00	0.00
32	TOTAL GAR ASSETS	1639.44	908.00	53.21	0.00	0.00	0.00
Assets excluded from the numerator for GAR calculation (covered in the denominator)							
33	EU Non-financial corporations (not subject to NFRD disclosure obligations)	1837.47					
34	Loans and advances	1826.43					
35	Debt securities	11.04					
36	Equity instruments	0.00					
37	Non-EU Non-financial corporations (not subject to NFRD disclosure obligations)	5.28					
38	Loans and advances	0.50					
39	Debt securities	4.78					
40	Equity instruments	0.00					
41	Derivatives	0.00					
42	On demand interbank loans	0.00					
43	Cash and cash-related assets	0.00					
44	Other assets (e.g. Goodwill, commodities etc.)	109.90					
45	TOTAL ASSETS IN THE DENOMINATOR (GAR)	3592.09					
Other assets excluded from both the numerator and denominator for GAR calculation							
46	Sovereigns	723.68					
47	Central banks exposure	387.68					
48	Trading book	19.11					
49	TOTAL ASSETS EXCLUDED FROM NUMERATOR AND DENOMINATOR	1130.47					
50	TOTAL ASSETS	4722.56					

(continued)

g

h

i

j

k

Disclosure reference date 31-12-2024

Million EUR	Climate Change Adaptation (CCA)					
	Of which towards taxonomy relevant sectors (Taxonomy-eligible)					
	Of which environmentally sustainable (Taxonomy-aligned)					
		Of which specialised lending		Of which adaptation		Of which enabling
GAR - Covered assets in both numerator and denominator						
1	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	0.00	0.00	0.00	6.60	3.48
2	Financial corporations	0.00	0.00	0.00	0.92	0.11
3	Credit institutions	0.00	0.00	0.00	0.00	0.00
4	Loans and advances	0.00	0.00	0.00	0.00	0.00
5	Debt securities, including UoP	0.00	0.00	0.00	0.00	0.00
6	Equity instruments		0.00		0.00	0.00
7	Other financial corporations	0.00	0.00	0.00	0.92	0.11

(All amounts are in EUR thousand, unless otherwise stated)

8	of which investment firms	0.00	0.00	0.00	0.00	0.00
9	Loans and advances	0.00	0.00	0.00	0.00	0.00
10	Debt securities, including UoP	0.00	0.00	0.00	0.92	0.11
11	Equity instruments		0.00		0.00	0.00
12	of which management companies	0.00	0.00	0.00	0.00	0.00
13	Loans and advances	0.00	0.00	0.00	0.00	0.00
14	Debt securities, including UoP	0.00	0.00	0.00	0.00	0.00
15	Equity instruments		0.00		0.00	0.00
16	of which insurance undertakings	0.00	0.00	0.00	0.00	0.00
17	Loans and advances	0.00	0.00	0.00	0.00	0.00
18	Debt securities, including UoP	0.00	0.00	0.00	0.00	0.00
19	Equity instruments		0.00		0.00	0.00
20	Non-financial corporations (subject to NFRD disclosure obligations)	0.00	0.00	0.00	5.67	3.37
21	Loans and advances	0.00	0.00	0.00	0.00	0.00
22	Debt securities, including UoP	0.00	0.00	0.00	5.67	3.37
23	Equity instruments		0.00		0.00	0.00
24	Households					
25	of which loans collateralised by residential immovable property					
26	of which building renovation loans					
27	of which motor vehicle loans					
28	Local governments financing	0.00	0.00	0.00	0.00	0.00
29	Housing financing	0.00	0.00	0.00	0.00	0.00
30	Other local governments financing	0.00	0.00	0.00	0.00	0.00
31	Collateral obtained by taking possession: residential and commercial immovable properties	0.00	0.00	0.00	0.00	0.00
32	TOTAL GAR ASSETS	0.00	0.00	0.00	6.60	3.48
Assets excluded from the numerator for GAR calculation (covered in the denominator)						
33	EU Non-financial corporations (not subject to NFRD disclosure obligations)					
34	Loans and advances					
35	Debt securities					
36	Equity instruments					
37	Non-EU Non-financial corporations (not subject to NFRD disclosure obligations)					
38	Loans and advances					
39	Debt securities					
40	Equity instruments					
41	Derivatives					
42	On demand interbank loans					
43	Cash and cash-related assets					
44	Other assets (e.g. Goodwill, commodities etc.)					
45	TOTAL ASSETS IN THE DENOMINATOR (GAR)					
Other assets excluded from both the numerator and denominator for GAR calculation						
46	Sovereigns					
47	Central banks exposure					

(All amounts are in EUR thousand, unless otherwise stated)

48	Trading book	
49	TOTAL ASSETS EXCLUDED FROM NUMERATOR AND DENOMINATOR	
50	TOTAL ASSETS	

(continued)

Million EUR		l	m	n	o	p
		Disclosure reference date 31-12-2024				
		TOTAL (CCM + CCA)				
		Of which towards taxonomy relevant sectors (Taxonomy-eligible)				
		Of which environmentally sustainable (Taxonomy-aligned)				
				Of which specialised lending	Of which transitional/adaptation	Of which enabling
GAR - Covered assets in both numerator and denominator						
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	914.59	56.69	0.00	0.00	0.00
2	Financial corporations	1.95	0.33	0.00	0.00	0.00
3	Credit institutions	0.00	0.00	0.00	0.00	0.00
4	Loans and advances	0.00	0.00	0.00	0.00	0.00
5	Debt securities, including UoP	0.00	0.00	0.00	0.00	0.00
6	Equity instruments	0.00	0.00		0.00	0.00
7	Other financial corporations	1.95	0.33	0.00	0.00	0.00
8	of which investment firms	0.00	0.00	0.00	0.00	0.00
9	Loans and advances	0.00	0.00	0.00	0.00	0.00
10	Debt securities, including UoP	1.95	0.33	0.00	0.00	0.00
11	Equity instruments	0.00	0.00		0.00	0.00
12	of which management companies	0.00	0.00	0.00	0.00	0.00
13	Loans and advances	0.00	0.00	0.00	0.00	0.00
14	Debt securities, including UoP	0.00	0.00	0.00	0.00	0.00
15	Equity instruments	0.00	0.00		0.00	0.00
16	of which insurance undertakings	0.00	0.00	0.00	0.00	0.00
17	Loans and advances	0.00	0.00	0.00	0.00	0.00
18	Debt securities, including UoP	0.00	0.00	0.00	0.00	0.00
19	Equity instruments	0.00	0.00		0.00	0.00
20	Non-financial corporations (subject to NFRD disclosure obligations)	12.96	6.74	0.00	0.00	0.00
21	Loans and advances	0.00	0.00	0.00	0.00	0.00
22	Debt securities, including UoP	12.96	6.74	0.00	0.00	0.00
23	Equity instruments	0.00	0.00		0.00	0.00
24	Households	899.68	49.62	0.00	0.00	0.00
25	of which loans collateralised by residential immovable property	886.38	49.62	0.00	0.00	0.00
26	of which building renovation loans	10.31	0.00	0.00	0.00	0.00
27	of which motor vehicle loans	2.99	0.00	0.00	0.00	0.00
28	Local governments financing	0.00	0.00	0.00	0.00	0.00
29	Housing financing	0.00	0.00	0.00	0.00	0.00
30	Other local governments financing	0.00	0.00	0.00	0.00	0.00

(All amounts are in EUR thousand, unless otherwise stated)

31	Collateral obtained by taking possession: residential and commercial immovable properties	0.00	0.00	0.00	0.00	0.00
32	TOTAL GAR ASSETS	914.59	56.69	0.00	0.00	0.00
Assets excluded from the numerator for GAR calculation (covered in the denominator)						
33	EU Non-financial corporations (not subject to NFRD disclosure obligations)					
34	Loans and advances					
35	Debt securities					
36	Equity instruments					
37	Non-EU Non-financial corporations (not subject to NFRD disclosure obligations)					
38	Loans and advances					
39	Debt securities					
40	Equity instruments					
41	Derivatives					
42	On demand interbank loans					
43	Cash and cash-related assets					
44	Other assets (e.g. Goodwill, commodities etc.)					
45	TOTAL ASSETS IN THE DENOMINATOR (GAR)					
Other assets excluded from both the numerator and denominator for GAR calculation						
46	Sovereigns					
47	Central banks exposure					
48	Trading book					
49	TOTAL ASSETS EXCLUDED FROM NUMERATOR AND DENOMINATOR					
50	TOTAL ASSETS					

Template 8 - GAR (%)

	a	b	c	d	e	f	g	h	i	j	
Disclosure reference date 31-12-2024: KPIs on stock											
Climate Change Mitigation (CCM)											
Climate Change Adaptation (CCA)											
% (compared to total covered assets in the denominator))	Proportion of eligible assets funding taxonomy relevant sectors					Proportion of eligible assets funding taxonomy relevant sectors					
		Of which environmentally sustainable					Proportion of eligible assets funding taxonomy relevant sectors				
			Of which specialised lending	Of which transitional	Of which enabling			Of which specialised lending	Of which adaptation	Of which enabling	
1	GAR	25.3%	1.5%	0.0%	0.0%	0.0%	0.2%	0.1%	0.0%	0.0%	0.0%
2	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	25.3%	1.6%	0.0%	0.0%	0.0%	0.2%	0.1%	0.0%	0.0%	0.0%
3	Financial corporations	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
4	Credit institutions	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
5	Other financial corporations	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
6	of which investment firms	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%

(All amounts are in EUR thousand, unless otherwise stated)

7	of which management companies	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
8	of which insurance undertakings	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
9	Non-financial corporations subject to NFRD disclosure obligations	0.2%	0.1%	0.0%	0.0%	0.0%	0.2%	0.1%	0.0%	0.0%	0.0%
10	Households	25.0%	1.4%	0.0%	0.0%	0.0%					
11	of which loans collateralised by residential immovable property	24.7%	1.4%	0.0%	0.0%	0.0%					
12	of which building renovation loans	0.3%	0.0%	0.0%	0.0%	0.0%					
13	of which motor vehicle loans	0.1%	0.0%	0.0%	0.0%	0.0%					
14	Local government financing	0.0%	0.0%	0.0%	0.0%	0.0%					
15	Housing financing	0.0%	0.0%	0.0%	0.0%	0.0%					
16	Other local governments financing	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
17	Collateral obtained by taking possession: residential and commercial immovable properties	0.0%	0.0%	0.0%	0.0%	0.0%					

(continued)

		k	l	m	n	o	p
		Disclosure reference date 31-12-2024: KPIs on stock					
		TOTAL (CCM + CCA)					
		Proportion of eligible assets funding taxonomy relevant sectors					Proportion of total assets covered
		Of which environmentally sustainable					
GAR			Of which specialised lending	Of which transitional/adaptation	Of which enabling		
% (compared to total covered assets in the denominator))							
1	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	25.5%	1.6%	0.0%	0.0%	0.0%	34.7%
2	Financial corporations	25.5%	1.7%	0.0%	0.0%	0.0%	34.7%
3	Credit institutions	0.1%	0.0%	0.0%	0.0%	0.0%	3.7%
4	Other financial corporations	0.0%	0.0%	0.0%	0.0%	0.0%	0.2%
5	of which investment firms	0.1%	0.0%	0.0%	0.0%	0.0%	3.5%
6	of which management companies	0.1%	0.0%	0.0%	0.0%	0.0%	3.5%
7	of which insurance undertakings	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
8	Non-financial corporations subject to NFRD disclosure obligations	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
9	Households	0.4%	0.2%	0.0%	0.0%	0.0%	0.3%
10	of which loans collateralised by residential immovable property	25.0%	1.4%	0.0%	0.0%	0.0%	29.9%
11	of which building renovation loans	24.7%	1.4%	0.0%	0.0%	0.0%	18.8%
12	of which motor vehicle loans	0.3%	0.0%	0.0%	0.0%	0.0%	1.7%
13	Local government financing	0.1%	0.0%	0.0%	0.0%	0.0%	1.0%
14	Housing financing	0.0%	0.0%	0.0%	0.0%	0.0%	0.8%
15	Other local governments financing	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
16	Collateral obtained by taking possession: residential and commercial immovable properties	0.0%	0.0%	0.0%	0.0%	0.0%	0.8%
17	% (compared to total covered assets in the denominator))	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%

(All amounts are in EUR thousand, unless otherwise stated)

(continued)

	q	r	s	t	u	v	w	x	y	z
Disclosure reference date 31-12-2024: KPIs on flows										
Climate Change Mitigation (CCM)						Climate Change Adaptation (CCA)				
% (compared to total covered assets in the denominator))	Proportion of new eligible assets funding taxonomy relevant sectors					Proportion of new eligible assets funding taxonomy relevant sectors				
	Of which environmentally sustainable					Of which environmentally sustainable				
			Of which specialised lending	Of which transitional	Of which enabling			Of which specialised lending	Of which adaptation	Of which enabling
1	GAR	100.0%	7.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
2	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	100.0%	7.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
3	Financial corporations	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
4	Credit institutions	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
5	Other financial corporations	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
6	of which investment firms	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
7	of which management companies	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
8	of which insurance undertakings	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
9	Non-financial corporations subject to NFRD disclosure obligations	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
10	Households	100.0%	7.0%	0.0%	0.0%	0.0%				
11	of which loans collateralised by residential immovable property	98.8%	7.0%	0.0%	0.0%	0.0%				
12	of which building renovation loans	0.5%	0.0%	0.0%	0.0%	0.0%				
13	of which motor vehicle loans	0.7%	0.0%	0.0%	0.0%	0.0%				
14	Local government financing	0.0%	0.0%	0.0%	0.0%	0.0%				
15	Housing financing	0.0%	0.0%	0.0%	0.0%	0.0%				
16	Other local governments financing	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
17	Collateral obtained by taking possession: residential and commercial immovable properties	0.0%	0.0%	0.0%	0.0%	0.0%				

(continued)

	aa	ab	ac	ad	ae	af
Disclosure reference date 31-12-2024: KPIs on flows						
TOTAL (CCM + CCA)						
% (compared to total covered assets in the denominator))	Proportion of new eligible assets funding taxonomy relevant sectors					Proportion of total new assets covered
	Of which environmentally sustainable					
		Of which specialised lending	Of which transitional/adaptation	Of which enabling		
1	GAR	100.0%	7.0%	0.0%	0.0%	5.9%
2	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	100.0%	7.0%	0.0%	0.0%	5.9%
3	Financial corporations	0.0%	0.0%	0.0%	0.0%	0.0%
4	Credit institutions	0.0%	0.0%	0.0%	0.0%	0.0%
5	Other financial corporations	0.0%	0.0%	0.0%	0.0%	0.0%

(All amounts are in EUR thousand, unless otherwise stated)

6	of which investment firms	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
7	of which management companies	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
8	of which insurance undertakings	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
9	Non-financial corporations subject to NFRD disclosure obligations	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
10	Households	100.0%	7.0%	0.0%	0.0%	0.0%	5.9%
11	of which loans collateralised by residential immovable property	98.8%	7.0%	0.0%	0.0%	0.0%	5.8%
12	of which building renovation loans	0.5%	0.0%	0.0%	0.0%	0.0%	0.0%
13	of which motor vehicle loans	0.7%	0.0%	0.0%	0.0%	0.0%	0.0%
14	Local government financing	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
15	Housing financing	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
16	Other local governments financing	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
17	Collateral obtained by taking possession: residential and commercial immovable properties	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%

Template 9 - Mitigating actions: BTAR

Template 9.1 - Mitigating actions: Assets for the calculation of BTAR

		a	b	c	d	e	F
		Disclosure reference date 31.12.2024					
		Climate Change Mitigation (CCM)					
		Of which towards taxonomy relevant sectors (Taxonomy-eligible)					
		Of which environmentally sustainable (Taxonomy-aligned)					
				Of which specialised lending		Of which enabling	
Million EUR		Total gross carrying amount					
1	Total GAR Assets	3592.09	908.00	53.21	0.00	0.00	0.00
Assets excluded from the numerator for GAR calculation (covered in the denominator) but included in the numerator and denominator of the BTAR							
2	EU Non-financial corporations (not subject to NFRD disclosure obligations)	1837.47	0.00	0.00	0.00	0.00	0.00
3	Loans and advances	1826.43	0.00	0.00	0.00	0.00	0.00
4	of which loans collateralised by commercial immovable property	239.08	0.00	0.00	0.00	0.00	0.00
5	of which building renovation loans	125.69	0.00	0.00	0.00	0.00	0.00
6	Debt securities	11.04	0.00	0.00	0.00	0.00	0.00
7	Equity instruments	0.00	0.00	0.00	0.00	0.00	0.00
8	Non-EU Non-financial corporations (not subject to NFRD disclosure obligations)	5.28	0.00	0.00	0.00	0.00	0.00
9	Loans and advances	0.50	0.00	0.00	0.00	0.00	0.00
10	Debt securities	4.78	0.00	0.00	0.00	0.00	0.00
11	Equity instruments	0.00	0.00	0.00	0.00	0.00	0.00
12	TOTAL BTAR ASSETS	1842.75	0.00	0.00	0.00	0.00	0.00
Assets excluded from the numerator of BTAR (covered in the denominator)							
13	Derivatives	0.00					
14	On demand interbank loans	0.00					
15	Cash and cash-related assets	0.00					
16	Other assets (e.g. Goodwill, commodities etc.)	109.90					
17	TOTAL ASSETS IN THE DENOMINATOR	3592.09					
Other assets excluded from both the numerator and denominator for BTAR calculation							
18	TOTAL ASSETS EXCLUDED FROM NUMERATOR AND DENOMINATOR	1130.47					
19	TOTAL ASSETS	4722.56					

(All amounts are in EUR thousand, unless otherwise stated)

(continued)		g	h	i	j	k
		Disclosure reference date 31.12.2024				
		Climate Change Adaptation (CCA)				
Million EUR		Of which towards taxonomy relevant sectors (Taxonomy-eligible)				
		Of which environmentally sustainable (Taxonomy-aligned)				
		Of which specialised lending	Of which adaptation		Of which enabling	
1	Total GAR Assets	6.60	3.48	0.00	0.00	0.00
Assets excluded from the numerator for GAR calculation (covered in the denominator) but included in the numerator and denominator of the BTAR						
2	EU Non-financial corporations (not subject to NFRD disclosure obligations)	0.00	0.00	0.00	0.00	0.00
3	Loans and advances	0.00	0.00	0.00	0.00	0.00
4	of which loans collateralised by commercial immovable property					
5	of which building renovation loans					
6	Debt securities	0.00	0.00	0.00	0.00	0.00
7	Equity instruments	0.00	0.00	0.00	0.00	0.00
8	Non-EU Non-financial corporations (not subject to NFRD disclosure obligations)	0.00	0.00	0.00	0.00	0.00
9	Loans and advances	0.00	0.00	0.00	0.00	0.00
10	Debt securities	0.00	0.00	0.00	0.00	0.00
11	Equity instruments	0.00	0.00	0.00	0.00	0.00
12	TOTAL BTAR ASSETS	0.00	0.00	0.00	0.00	0.00
Assets excluded from the numerator of BTAR (covered in the denominator)						
13	Derivatives					
14	On demand interbank loans					
15	Cash and cash-related assets					
16	Other assets (e.g. Goodwill, commodities etc.)					
17	TOTAL ASSETS IN THE DENOMINATOR					
Other assets excluded from both the numerator and denominator for BTAR calculation						
18	TOTAL ASSETS EXCLUDED FROM NUMERATOR AND DENOMINATOR					
19	TOTAL ASSETS					
(continued)		l	m	n	o	p
		Disclosure reference date 31.12.2024				
		TOTAL (CCM + CCA)				
Million EUR		Of which towards taxonomy relevant sectors (Taxonomy-eligible)				
		Of which environmentally sustainable (Taxonomy-aligned)				
		Of which specialised lending	Of which transitional / adaptation		Of which enabling	
1	Total GAR Assets	914.59	56.69	0.00	0.00	0.00
Assets excluded from the numerator for GAR calculation (covered in the denominator) but included in the numerator and denominator of the BTAR						
2	EU Non-financial corporations (not subject to NFRD disclosure obligations)	0.00	0.00	0.00	0.00	0.00
3	Loans and advances	0.00	0.00	0.00	0.00	0.00
4	of which loans collateralised by commercial immovable property	0.00	0.00	0.00	0.00	0.00
5	of which building renovation loans	0.00	0.00	0.00	0.00	0.00
6	Debt securities	0.00	0.00	0.00	0.00	0.00
7	Equity instruments	0.00	0.00	0.00	0.00	0.00
8	Non-EU Non-financial corporations (not subject to NFRD disclosure obligations)	0.00	0.00	0.00	0.00	0.00

(All amounts are in EUR thousand, unless otherwise stated)

9	Loans and advances	0.00	0.00	0.00	0.00	0.00
10	Debt securities	0.00	0.00	0.00	0.00	0.00
11	Equity instruments	0.00	0.00	0.00	0.00	0.00
12	TOTAL BTAR ASSETS	0.00	0.00	0.00	0.00	0.00
Assets excluded from the numerator of BTAR (covered in the denominator)						
13	Derivatives					
14	On demand interbank loans					
15	Cash and cash-related assets					
16	Other assets (e.g. Goodwill, commodities etc.)					
17	TOTAL ASSETS IN THE DENOMINATOR					
Other assets excluded from both the numerator and denominator for BTAR calculation						
18	TOTAL ASSETS EXCLUDED FROM NUMERATOR AND DENOMINATOR					
19	TOTAL ASSETS					

Template 9.2. BATR %

		a	b	c	d	e	f	g	h	i	j
		Disclosure reference date 31.12.2024									
		Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				
		Proportion of eligible assets funding taxonomy relevant sectors					Proportion of eligible assets funding taxonomy relevant sectors				
		Of which environmentally sustainable					Of which environmentally sustainable				
				Of which specialised lending	Of which transitional	Of which enabling			Of which specialised lending	Of which adaptation	Of which enabling
% (compared to total covered assets in the denominator)											
1	BATR	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
2	GAR	25.3%	1.5%	0.0%	0.0%	0.0%	0.2%	0.1%	0.0%	0.0%	0.0%
3	EU Non-financial corporations not subject to NFRD disclosure obligations	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
4	of which loans collateralised by commercial immovable property	0.0%	0.0%	0.0%	0.0%	0.0%					
5	of which building renovation loans	0.0%	0.0%	0.0%	0.0%	0.0%					
6	Non-EU country counterparties not subject to NFRD disclosure obligations	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%

(All amounts are in EUR thousand, unless otherwise stated)

(continued)

	k	l	m	n	o	p	q	r	s	t	u	
	Disclosure reference date 31.12.2024											
	TOTAL (CCM + CCA)							Climate Change Mitigation (CCM)				
% (compared to total covered assets in the denominator)	Proportion of eligible assets funding taxonomy relevant sectors						Proportion of total assets covered	Proportion of new eligible assets funding taxonomy relevant sectors				
	Of which environmentally sustainable							Of which environmentally sustainable				
	Of which specialised lending		Of which transitional / adaptation		Of which enabling			Of which specialised lending		Of which transitional		Of which enabling
1	BATR	0.0%	0.0%	0.0%	0.0%	0.0%		0.0%	0.0%	0.0%	0.0%	0.0%
2	GAR	25.5%	1.6%	0.0%	0.0%	0.0%	76.1%	100.0%	7.0%	0.0%	0.0%	0.0%
3	EU Non-financial corporations not subject to NFRD disclosure obligations	0.0%	0.0%	0.0%	0.0%	0.0%	38.9%	0.0%	0.0%	0.0%	0.0%	0.0%
4	of which loans collateralised by commercial immovable property	0.0%	0.0%	0.0%	0.0%	0.0%	5.1%	0.0%	0.0%	0.0%	0.0%	0.0%
5	of which building renovation loans	0.0%	0.0%	0.0%	0.0%	0.0%	2.7%	0.0%	0.0%	0.0%	0.0%	0.0%
6	Non-EU country counterparties not subject to NFRD disclosure obligations	0.0%	0.0%	0.0%	0.0%	0.0%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%

(continued)

	v	w	x	y	z	aa	ab	ac	ad	ae	af	
	Disclosure reference date 31.12.2024											
	Climate Change Adaptation (CCA)						TOTAL (CCM + CCA)					
% (compared to total covered assets in the denominator)	Proportion of new eligible assets funding taxonomy relevant sectors						Proportion of new eligible assets funding taxonomy relevant sectors					Proportion of total new assets covered
	Of which environmentally sustainable						Of which environmentally sustainable					
	Of which specialised lending		Of which adaptation		Of which enabling		Of which specialised lending		Of which transitional / adaptation		Of which enabling	
1	BATR	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
2	GAR	0.0%	0.0%	0.0%	0.0%	0.0%	100.0%	7.0%	0.0%	0.0%	0.0%	5.9%
3	EU Non-financial corporations not subject to NFRD disclosure obligations	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
4	of which loans collateralised by commercial						0.0%	0.0%	0.0%	0.0%	0.0%	0.0%

(All amounts are in EUR thousand, unless otherwise stated)

	immovable property												
5	of which building renovation loans						0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
6	Non-EU country counterparties not subject to NFRD disclosure obligations	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	

Template 9.3 - Summary table - BTAR %

	KPI			% coverage (over total assets)*
	Climate change mitigation (CCM)	Climate change adaptation (CCA)	Total (CCM + CCA)	
BTAR stock	0.0%	0.0%	0.0%	39.0%
BTAR flow	0.0%	0.0%	0.0%	0.0%

Template 10 – Other climate change mitigating actions that are not covered in the EU Taxonomy

The Bank considers that it does not have any Banking book positions that could be classified as other climate change mitigating actions that are not covered in Regulation (EU) 2020/852.